

1

2

3

4 SELECT COMMITTEE TO INVESTIGATE THE  
5 JANUARY 6TH ATTACK ON THE U.S. CAPITOL,  
6 U.S. HOUSE OF REPRESENTATIVES,  
7 WASHINGTON, D.C.

8

9

10

11 INTERVIEW OF: JASON FUNES

12

13

14

15

16 Wednesday, February 23, 2022

17

18 Washington, D.C.

19

20

21 The interview in the above matter was held via Webex, commencing at 11:12 a.m.

1

2        Appearances:

3

4

5        For the SELECT COMMITTEE TO INVESTIGATE

6        THE JANUARY 6TH ATTACK ON THE U.S. CAPITOL:

7

8        [REDACTED], STAFF ASSOCIATE

9        [REDACTED], INVESTIGATIVE COUNSEL

10        [REDACTED], CHIEF CLERK

11        [REDACTED], PROFESSIONAL STAFF MEMBER

12        [REDACTED], INVESTIGATIVE COUNSEL

1

2 [REDACTED]. Good morning, Mr. Funes.

3 Today is February 23rd, 2020. We are here for the transcribed interview of  
4 Mr. Jason Funes, conducted by the House Select Committee to Investigate the January  
5 6th Attack on the United States Capitol pursuant to H. Res. 503.

6 My name is [REDACTED], investigative counsel for the select committee. And,  
7 then, at this time, if you will, if you could state your name for the record and spell your  
8 last name.

9 Mr. Funes. My name is Jason Funes, F-u-n-e-s, no middle initial.

10 [REDACTED]. Thank you.

11 This will be a staff-led interview, though members may choose to join and ask  
12 questions. In the room today are myself and then [REDACTED], also investigative  
13 counsel with the committee. There are currently no members present, but I'll attempt  
14 to stop and recognize any members if they join us virtually.

15 [REDACTED]. Can you hold on one second, [REDACTED]?

16 [REDACTED]. Sure.

17 [REDACTED]. We have an IT issue I need to confirm.

18 [REDACTED]. Oh, sure.

19 Mr. Funes. And I can just -- so, again, my big thing, without an attorney, was  
20 just, you know, I hope everything was transparent. You know, I'm hoping that things  
21 aren't going to be used against me.

22 [REDACTED]. Let's hold on one second just to make sure that we're --

23 Mr. Funes. Oh, okay.

24 [REDACTED]. -- good on the tech side.

25 [REDACTED] [REDACTED] says we need to unmute something.

1 [REDACTED] You don't need to worry about it. I unmuted it for you.

2 [REDACTED] Oh.

3 [REDACTED] Okay. Thank you.

4 All right. Sorry. We're all good.

5 [REDACTED] do you want to keep going?

6 [REDACTED] Okay.

7 [REDACTED] Mr. Funes, you'll have a chance -- I think it probably makes sense for

8 [REDACTED]

9 Mr. Funes. Probably just to do that, just to do that --

10 [REDACTED] -- just to go through and do some introductory stuff --

11 Mr. Funes. Okay, sure.

12 [REDACTED] -- and then, if you have any introductory stuff you want to say, then  
13 you can put that, and then we -- just to make it more efficient.

14 [REDACTED] Yeah. We've got a few housekeeping items. So I'll just run  
15 through that, and then I'll kind of let you know --

16 Mr. Funes. Sure, sure, sure.

17 [REDACTED] -- if you've got something that you want to start with.

18 Mr. Funes. Thank you.

19 [REDACTED] So, Mr. Funes, you're here voluntarily today for the transcribed  
20 interview, and I understand you chose not to retain counsel for this interview.

21 So, like I said, just a couple housekeeping matters to discuss before we begin.

22 First, as you see, there's an official reporter transcribing our interview. So, just  
23 to make it easier for them, if you can wait until I finish my questions --

24 Mr. Funes. Sure.

25 [REDACTED] -- and then I'll also try to wait until you finish your answer, just so

1 that we don't speak over other. It's obviously very hard to record two people --

2 Mr. Funes. Yeah.

3 [REDACTED]. -- talking at the same time.

4 Mr. Funes. Oh, so are you doing one side, and you're doing me?

5 Oh, you're doing the whole thing?

6 [REDACTED]. They'll be switching.

7 And then, also, similarly, the stenographers can't record nonverbal responses, so,  
8 like, a head shake or a nod, so just make sure you answer with a clear "yes" or "no."

9 Does that make sense?

10 Mr. Funes. Sure.

11 [REDACTED]. And then, obviously, we're recording this interview through the  
12 stenographers and the camera. I just want to confirm that you're not --

13 Mr. Funes. Sure.

14 [REDACTED]. -- recording the interview. Okay.

15 Mr. Funes. And these are the people on the line?

16 [REDACTED]. So we have also some of the clerks associated with the committee  
17 who might be listening, and they're helping with exhibits and some of the technical  
18 aspects.

19 Mr. Funes. But they'll show up?

20 [REDACTED]. Their video will not appear.

21 Mr. Funes. But their names --

22 [REDACTED]. They stay off video. But [REDACTED] is a staff assistant with the  
23 committee, and he'll be pulling up exhibits if I ask him to that.

24 Mr. Funes. Is there other people, if they pop in, their name will appear and I'll  
25 see it?

1 [REDACTED] Yes, the names will appear --

2 Mr. Funes. Okay.

3 [REDACTED] -- and I'll announce them for the record --

4 Mr. Funes. Okay.

5 [REDACTED] -- if they come up, so you'll know who's --

6 Mr. Funes. Cool. Thank you.

7 [REDACTED] And one other thing I'll say, just because I've already sensed it. This  
8 is -- we appreciate you being informal and, you know, voluntary. Because we've got  
9 court reporters, it's difficult for them to transcribe it if we start to talk over each other.

10 And --

11 Mr. Funes. Sure.

12 [REDACTED] And so I appreciate the active listening, saying things like "sure,"  
13 confirming that you're hearing what we're saying, but we'll do our best to ask a complete  
14 question and then give you a chance to give a complete --

15 Mr. Funes. And I --

16 [REDACTED] -- answer.

17 Mr. Funes. -- apologize if I interrupt in the middle of stuff, but, just for me,  
18 clarification process-wise -- I'm ignorant to everything, so I'm just one of those people  
19 that want to ask. So I don't mean to be complicated or rude, but that's just where I'm  
20 coming from, if that does happen.

21 [REDACTED] Yeah. And then I'll try to remind you just to, you know --

22 Mr. Funes. Let you finish, and I'll -- okay. Sure.

23 [REDACTED] And I'm just putting it out there at the beginning so that you --

24 Mr. Funes. No, that's -- I appreciate it. No. You're cool. Thank you.

25 [REDACTED] In the same way that you don't want to -- we don't want you to think

1       we're being rude by asking you to wait to answer --

2           Mr. Funes. Yeah.

3           ██████████. -- until we're done.

4           Mr. Funes. No, I appreciate that too. Thank you.

5           Are we started already?

6           ██████████ We are on the record.

7           Mr. Funes. Oh, wow. Okay. So that was terrible.

8           ██████████. You're good.

9           Just a few more things to go through, and then we can start a more regular  
10      conversation.

11           Mr. Funes. Sure.

12           ██████████. So, also, we just ask that you provide complete answers based on  
13      your best recollection. If a question's not clear, feel free to ask me to rephrase it. And  
14      then, also, if you just don't know the answer, feel free to say that you don't know.

15           I'll note that there might be several people asking questions. I'll probably be  
16      asking most of them. █████ might jump in for a few questions. And there's some  
17      chance, as I mentioned, that either a member or another staff member will pop in on the  
18      Webex portal, and they might have some questions for you.

19           And then, lastly, I'll remind you -- and we remind all witnesses of this -- that it's  
20      unlawful to deliberately provide false information to a congressional investigator like  
21      myself or like █████, and so doing that could result in criminal penalties for false  
22      statements.

23           Do you understand that?

24           Mr. Funes. Yes, sir.

25           ██████████. Okay.

1           And then the last thing, actually, is, if you need a break at any point, either for  
2 water or bathroom or for whatever reason, just let me know. I'll try to take a break  
3 about every 1 hour, but I sometimes forget that, so feel free to stop me if you need a  
4 break.

5           Mr. Funes. Okay.

6           ██████████. Okay.

7           Mr. Funes. And, also, I have some comments or just, kind of, questions based off  
8 that, but go ahead.

9           ██████████. So that's most of the housekeeping items. We can kind of get into  
10 a conversation on the questions I have for you, but if you had anything that you wanted  
11 to start with.

12           Mr. Funes. Yeah. Just before and just while on the record, I wanted to make  
13 sure that -- you chose the words that I "chose not to retain counsel." I just want the  
14 committee and people to know that regular Americans are unable to retrieve any type of  
15 counsel because of the exorbitant amount of costs that it would incur. It's unrealistic  
16 for the average American citizen like myself to hide behind attorneys, because the  
17 committee has made things so aggressive against private citizens that they don't want to  
18 talk and people are scared of you guys.

19           And people are scared of what's happening to them, because it feels like our  
20 Fourth Amendment and our constitutional rights are being eroded by a committee  
21 investigating people that aren't suspects of a crime. Instead of approaching my family  
22 and me trying to get to the FBI and Federal Department of Justice officials, they chose to  
23 ignore me. So the only time I found out that the committee had any interest in speaking  
24 to me was because of a corporate policy that Verizon has with their customers to allow  
25 them to advise their customers that they're actually being subpoenaed.

1           And that was a dick move, because my parents got freaked out.  My mom is  
2        66 years old.  We're from a third-world country.  My family is from El Salvador.  
3        People get killed for speaking out against the government in those countries, and that's  
4        why my parents wanted me to stay away from politics.  For the past 5 years, I've been  
5        defying my parents and I've kept them ignorant of what I do, because I do not want my  
6        parents to stress, especially my mother.  She has [REDACTED] she worries too much,  
7        and that letter freaked her the hell out.

8           So, for a willing witness, somebody that wanted to go forward and actually give  
9        information to not only a political arm of this investigation, to the criminal justice part of  
10       an investigation, and they bucked.  And they told me over the phone they had all the  
11       information they wanted from me, when they had no idea what I actually had.

12           So I didn't choose not to retain counsel.  It's unfeasible for me to retain counsel,  
13        because I don't have the means.  And I've lost an income for an entire year, putting my  
14        life on the line, because what I have to say today isn't easy to say.  And I'm putting  
15        myself at risk every single day that I have after January 6th to get to the bottom of what  
16        happened because I believe and I now know that people within our Federal Government  
17        and our intelligence agencies knew that violence was going to take place that day, that  
18        people had bad intentions, and they let it happen.  They did nothing to stop it.

19           So, when you use the FBI to go grab people's cell phones, door to door, after  
20        January 6th to erase their phone messages, their videos, and to remove their social media  
21        posts, it intimidates the American people not to want to participate, because they don't  
22        want guys in black showing up and abducting them and taking them away.

23           Because guess what?  We don't know what the hell you guys are gonna do.  I  
24        don't know what kind of country I live in anymore.  I was born in this country, and this is  
25        not the same country I grew up in.  Something changed, and it all changed on January

1       6th. And the government allowed that to happen.

2           So I didn't choose not to retain counsel. The committee has aggressively  
3       persecuted American citizens that are innocent of crimes, people that wanted to come  
4       out and give forth information and they chose not to. And you guys aggressively  
5       harassed, ridiculed, and made an example of everybody wearing a MAGA hat or anybody  
6       associated with the President and demonized them. Because if you didn't, the media  
7       did.

8           And it's a shame, because my family came from a country where you get whacked  
9       for speaking out against the government. My father warned me years ago not to get  
10       involved in politics because something like this might happen, and here I am. So I've  
11       kept my family ignorant of this.

12           So, instead of asking me for my phone number and my information and my data,  
13       which I was more than willing to give if you asked, you chose to subpoena my family.  
14       And the only reason I found out is because of Verizon's corporate policy, because you  
15       would've done it behind my back. And that's shameful of the American Government to  
16       do that to its American citizens.

17           So nobody can actually retain counsel to come to you guys unless they have a  
18       family background where they can afford it.

19           So I'm coming here because I don't want you to use -- I'm coming here forward  
20       and on the record. And, [REDACTED] and [REDACTED], anybody else in the room, I want you to assure  
21       me that what I have to say is not going to be used against me.

22       [REDACTED]. So let me just start with just quickly saying that, you know, obviously,  
23       we don't agree with that characterization of events. And I just want to note that you're  
24       here voluntarily.

25           And then, as far as making any guarantees, like I've said, all we're here to do is

1 understand your perspective. We'll transcribe the interview and, you know, just move  
2 forward from there.

3 Mr. Funes. I just want to set --

4 [REDACTED]. The information that we obtain in the interview could potentially be  
5 used in a report. You'll have a chance to review the transcript after we've finished the  
6 interview. So those are the, sort of, guarantees that I can make you today.

7 Mr. Funes. So I'll be able to review the transcripts and the conversation that we  
8 had.

9 [REDACTED]. Yep. Correct.

10 Mr. Funes. Before it goes to the committee?

11 [REDACTED]. So this is -- you're currently testifying before the committee.

12 Mr. Funes. But, I mean --

13 [REDACTED]. The transcript is just being created to create a record of --

14 Mr. Funes. But can a copy of that be sent to me?

15 [REDACTED]. We will --

16 [REDACTED]. We can talk to you logically about that process, that --

17 Mr. Funes. Okay.

18 [REDACTED]. Yeah.

19 [REDACTED]. -- reviewing the transcript is to confirm the accuracy of what you  
20 said. So --

21 Mr. Funes. So I'm in a special exception since I'm coming here under my -- well,  
22 listen, that's okay. That's all right. I understand. I won't make an issue of it.

23 My point is that I come here fearful and not knowing, and I have friends saying,  
24 "Good luck." And it's not you guys, but what Congress has done to weaponize this  
25 investigation against the American people is wrong. And if you guys haven't heard that

1 before, you should. Because my family came here from a third-world country where  
2 shit like this happens. And people are scared to talk to you guys.

3 But I have nothing to hide. I did nothing wrong. And all I've been trying to do is  
4 pursue the truth for over a year, on my own dime, putting my life at risk. I've slept on  
5 park benches, avoiding people.

6 So what I have to say isn't coming easy, and I put my life on the line to be here to  
7 tell somebody. So I hope you guys do it justice and put accountability both on the  
8 private citizens and those within the Federal Government, before, on January 6th, and  
9 after, including this report.

10 [REDACTED]. Absolutely. Just getting an accurate picture of what happened on  
11 that day is what our interest is.

12 EXAMINATION

13 BY [REDACTED]:

14 Q So, if we can get to a few questions, I just want to start with some basic  
15 information about you.

16 Q Can you just tell me where you live currently?

17 A I am mobile. My permanent address is [REDACTED]

18 [REDACTED]

19 Q Okay. Great.

20 Q And then what's the highest level of education that you've obtained?

21 A I left college in my senior year. I have over 160 credit hours, and I left  
22 before I got my bachelor's. Double major and minor. I walked away.

23 Q And are you currently employed?

24 A I guess A.A. technically would be the answer to that. I do have an Associate  
25 of Arts degree.

1 Q Associate of Arts degree. Okay. Understood.

2 A And EMT license as well.

3 Q Understood.

4 And are you currently employed?

5 A I am not.

6 Q Okay. Do you have any source of income right now?

7 A I do not, no. I have no steady source of income.

8 Can I ask to be put under oath?

9 Q So this isn't a deposition, so we're not going to put you under oath. But  
10 what I will say and what I tried to kind of clarify in those ground rules is that our  
11 conversation today is subject to a law called the False Statements Act --

12 A I understand that. I want to go on the record and swear an oath to say that  
13 what I'm saying is true.

14 Q Yeah, that's not an option today. We didn't set this up as deposition, but --

15 A Okay. If I do a deposition in the future, I can swear that everything I'm  
16 about to say is true.

17 Q You can tell us that -- tell that to us now, and we can put it on the record.

18 A No, I know. That's kind of assumed. But I'm just saying, you know, I want  
19 to be under oath.

20 Q The assumption is that everything you'll tell us today is --

21 A Of course. But, again, I'm just asking. The request is to go under oath.

22 Okay.

23 Q We can't do that for you right now, sir.

24 A All right.

25 Q So we'll just go forward.

1 BY ██████████

2 Q But, again, just to clarify, anybody who speaks to the select committee,  
3 whether it's on a phone call and just an informal --

4 A I understand, sir. I've worked in the Federal Government. I get that.

5 Q But just to clarify for the record, anybody who speaks to investigators for the  
6 committee, whether it's just a brief, informational phone call, all the way up to a formal,  
7 day-long deposition, is obligated under Federal law to tell the truth.

8 So the assumption is -- that's why we make that advisement. And you said you  
9 understand that. The obligation is to tell the truth. I understand what you'd like to do  
10 is to go under oath, and --

11 A Yes.

12 Q -- the transcript will reflect you've made that request --

13 A Okay.

14 Q -- and we're not in the setting to do that at this time.

15 A And the reason I ask is, I don't want to be given the Hillary Clinton 4th of  
16 July, 2016, treatment where I would speak to investigators under oath. So my  
17 willingness is there, so that you know.

18 BY [REDACTED]

19 Q Understood. Gotcha.

20 I'd just like to go over your sources of income since -- let's go back to 2016. We  
21 can start with, if you just want to give me a list of sources of income, either individuals or  
22 entities that you've worked for --

23 A No. I'm going to give you a couple that I -- you can look up the rest.

24 When I worked in the administration at the U.S. Department of Interior. Okay?

25 I worked on the campaign in 2020. All right?

1           After that, a security job that I was supposed to get paid, the guy balked on me  
2 and still owes me \$3,000. Tariek Leith, by the way. L-e-i-t-h, Tariek, T-a-r-i-e-k. He  
3 might be under Federal investigation, from what I've been told. So I am a licensed  
4 private armed security guard. It just sucks, at the time I did work for somebody in  
5 Florida, they ripped me off and ran away with the money. And he's a Marine Reservist.

6           So I haven't had steady income, and I don't have income, and you guys can ask the  
7 IRS about anything else.

8           Q     I'll just ask you about a couple particular entities.

9           I know you told me that for Women for America First reimbursed you for some  
10 expenses. Did they ever pay you? And did you ever receive an income from them?

11           A     No, I've never received an income from them. Amy knew and understood  
12 the circumstances of what I was signing up for. I did not sign up for a job. I went there  
13 to volunteer, and she gave me a little bit of money. I can't even remember. It was just  
14 a frickin' -- put some money in my pocket. It wasn't, like, anything outrageous, maybe a  
15 few hundred bucks or something.

16           But, no, I was not employee. I was volunteering for the Women for America  
17 First.

18           Q     Okay.

19           A     And the only time I did get paid was from Cindy Chafian for the January 5th  
20 event. And I made sure I invoiced her, because I can't work for free and go to D.C. and  
21 hotel and all that jazz without getting something paid for it. I'm not an idiot.

22           Q     That was going to be my next question, actually. So Cindy Chafian has paid  
23 you, but not Women for America First?

24           A     Yes.

25           Q     Okay.

1           A    I invoiced Cindy Chafian and her 80% Coalition.

2           Q    Okay.

3           And then I know you mentioned you worked for the Trump campaign in 2020.

4           Did you also have a paid position in 2016?

5           A    Yes, I did work for the national campaign. And the day after I quit the  
6    Republican Party of Florida because I realized they were sabotaging Donald Trump's  
7    Presidential campaign in 2016 -- because they were using the i360 from Marco Rubio's  
8    reelect campaign in 2016. And the party assured me after the RNC convention that the  
9    systems and infrastructures would be married for door-knocking and phone calls, and the  
10   i360 app was getting vetted by the State Department.

11           So Marco Rubio's reelect campaign had a bunch of cool gadgets and toys, and  
12    Donald Trump was still using dog crap. And the moment I found that out, I basically put  
13    my resignation in with the Republican Party of Florida, effective immediately, to the State  
14    director, Brian Barrett. And I put it in writing that they were sabotaging his Presidential  
15    campaign.

16           And then I got hired by the Presidential -- or Donald J. Trump for President, Inc.,  
17    the day after.

18           Q    Have you ever worked for or received an income from Latinos for Trump?

19           A    No.

20           Q    Have you volunteered with Latinos for Trump?

21           A    Bianca Gracia started an organization called Latinas for Trump, and she has  
22    things incorporated with her. I've met her briefly. I'm a Latino. I'm for Trump. I  
23    can say I'm Latinos for Trump. I don't represent any organization. I'm not in any  
24    organization officially through hers, okay? Because she has her own little circle group,  
25    and I don't know what she does with her organization besides for getting tips from Robert

1       Caron on how to run it and Enrique Tarrio, okay?

2           So there's dispute about that, but yeah. You know, I'm a Latino for Trump, but I  
3       don't represent and never been hired and never received an income from that  
4       organization.

5           Q    In the 2016 campaign, did you do work with Bianca Gracia or Latinos for  
6       Trump?

7           A    Say that again, I'm sorry? During the 20 --

8           Q    During the 2016 --

9           A    2016? No. Again, I worked in Florida primarily. I was on the national  
10       campaign, but most of my work was done in central and south Florida. And if I saw her,  
11       maybe, sure, but never at any point in time did I do any work with her or extend her any  
12       favors or even really know who she was. I think the first time I met her she didn't even  
13       speak Spanish.

14           Q    Okay.

15           You mentioned Enrique Tarrio working with Latinos for Trump. In what context  
16       did you become aware that Mr. Tarrio worked with Latinos for Trump?

17           A    When Bianca told me that he was one of his founding -- or one of her  
18       founding members.

19           Q    Okay. And when was that?

20           A    After January 6th.

21           Q    Okay. So I'll represent to you that Mr. Tarrio was a political director of  
22       Latinos for Trump in the 2016 campaign. So --

23           A    Okay.

24           Q    -- my specific question is, did you ever come in contact with Mr. Tarrio --

25           A    I didn't know who he was.

1           Q    Okay.

2           And, then, I've seen also that you've noted that you were a Florida RV driver in the  
3   2016 campaign.

4           A    Yes, sir.

5           Q    Can you just tell me what that was?

6           A    I didn't know what job title to put, but I could've come up and BS'ed  
7   something fancier in politics, but screw it. I'm not here to tiptoe.

8           So it was basically, like, a mobile office. So we were doing voter registrations,  
9   helping local offices pop up their grand openings, and getting things together as far as  
10   getting the momentum and people out to different events. So we literally had an RV, a  
11   32-foot WinStar RV, with "Make America Great Again" and Donald Trump with two  
12   thumbs up, and we were just driving around and making stuff happen.

13          Q    Okay. And none of that work was associated with Latinos for Trump?

14          A    No. Hell no.

15          Q    Okay.

16          A    I should've put a better title on that, looking back, than RV driver. Mobile  
17   office coordinator.

18          Q    At what point did you switch from that campaign work to your work at the  
19   Department of Interior?

20          A    So it was standard in politics, any left, right, or center campaign, you know,  
21   your job is till election, right? So -- or maybe a few days thereafter, right? And then  
22   everybody signs up for the job knowing that you're out or you're done till you can move  
23   forward.

24          So I was kind of a little stagnant in that area, but I got hired to come to the  
25   administration -- I think my starting date was, like, March 16th of 2017.

1           Q    And can you just describe for me what you did at the Department of  
2   Interior?

3           A    I loved working for an honorable and great man by the name of Ryan Zinke,  
4   a former Congressman of Montana.  And he taught us to be unafraid of attacks if you're  
5   doing the right thing and for the people.

6           So I did intergovernmental and external affairs for Secretary Zinke dealing with,  
7   again, intergovernmental -- you know what that is, right, or do I have to go in detail?

8           Q    You can describe it for the record.

9           A    Well, so I did lot of work with NGOs, a lot of public policy groups, think tanks,  
10   nationwide, State-based, from coast to coast.  Anywhere we had Federal land, that was  
11   basically my focus, since the U.S. Department of Interior works on shore and offshore  
12   estate.

13           And so I did a lot of groups with -- worked with energy groups.  Anything that the  
14   Secretary's priorities were, we made sure to make those meetings and arrangements  
15   happens, and did a lot of coalition-building, networking.  And was privileged to do  
16   several public speaking engagements on behalf of the administration.

17           Q    Great.  Okay.

18           BY [REDACTED] :

19           Q    What was your job title at the Interior Department?

20           A    Special Assistant, Intergovernmental and External Affairs.

21           Q    And was that based here --

22           A    Office of -- immediate Office of the Secretary.

23           Q    And was that based here in Washington, D.C.?

24           A    Yep.  The C Street Building.

25           BY [REDACTED] :

1 Q And then how long did you stay at the Department of Interior?

2 A I think it was about, like, 2-1/2 years at the end of it. I guess the official  
3 end day was, like, October-something.

4 Q And then did your title or position ever change while you were there?

5 A No.

6 [REDACTED]. So that would've been October of 2019?

7 Mr. Funes. Yeah. Yeah.

8 Yeah, that White House liaison was a wicked witch, that woman. Oof. You  
9 guys gotta be careful with those people.

10 BY [REDACTED]:

11 Q So from October 2019 when you left Department of Interior, what was your  
12 next position?

13 A I loved politics so much that I decided to leave the executive branch of  
14 government and decided to join the U.S. Army instead. So that was the reason of my  
15 leaving. I just wanted to get a little time away to hike and make sure I'm tweaking my  
16 body and getting in great shape.

17 I'm an avid amateur athlete. I've done jiu-jitsu, trained MMA, played rugby.  
18 And all I wanted to do was serve my country and join the Special Forces and become a  
19 Green Beret.

20 And the U.S. Army recruiting office right here on 15th, after I passed my drug test,  
21 went to MEPS and got my physical, he disqualified my application before he even sent it  
22 over for processing. So he screwed me over. And I had to get another recruiter in  
23 Tennessee to pick up my application, start moving it forward, because this asshole  
24 screwed me over.

25 And he had a picture of Barack Obama and Michelle and the family on his desk.

1       And I didn't think anything of it. I thought he was green. We're all Army, right?  
2       We're still trying to serve our country. And that guy screwed me over, disqualified my  
3       application, and lied to me. And it was a downward spiral.

4           And because of a DUI 15 years ago and a paraphernalia charge from 12 years ago,  
5       I didn't have the moral aptitude, according to the U.S. Army, to join them. And so,  
6       therefore, I was not allowed to join the U.S. Army and serve my country. Because  
7       that Army recruiting officer at the first -- here in Washington, D.C., is a partisan prick.

8           So, after that, I ended up working for the campaign in 2020.

9           Q     And which campaign was that?

10          A     The Presidential campaign for Trump.

11          Q     Okay. And did you have a title with the campaign?

12          A     I guess eventually I was the lead advance representative. Moved on up  
13        from RV driver, huh?

14          Q     Sounds like it.

15        Were you based out of anywhere when you did that work?

16          A     I was national. I worked for the national campaign. I did work for Team  
17        Trump on tour and did events for First Family -- Don Jr. and Eric Trump.

18          Q     Okay. Did you have -- I'm just kind of trying to understand the chain of  
19        command or org chart. Did you have somebody that you reported to there?

20          A     If you guys have ever been part of a campaign, especially at that level, it's a  
21        million miles an hour, okay? So we worked as a team. The advance office was a lot of  
22        people, but it's a well-oiled machine.

23           So, I mean, eventually, Justin Caporale, I guess, would've been my boss. But he  
24        was the head for all advance, right? So I didn't work exclusively with him. I didn't have  
25        any type of exclusive relationship with anybody directly tied to the campaign.

1           I was too busy doing my job and being out in the field and getting 2, 3 hours of  
2    sleep sometimes a day and working my ass off traveling the country. And I got to about  
3    14 different States in the 2020 campaign.

4           Q    And can you give me an idea of the timeframe of that position, when did you  
5    start, and if there was an end time?

6           A    I left -- my first day of work, July 31st.

7           Q    So July 31st, 2020, was your first day of work?

8           A    Yes, sir. Till the standard -- you're contracted till the election, right? So,  
9    what, November 15th I guess technically would've been my last day as an employee.

10          Q    Okay. And did you receive a salary for that whole time?

11          A    It wasn't salary-based. It was work-based, days out in the field.

12          Q    Okay. So how did you log that? Did you just submit --

13          A    We would --

14          Q    -- an invoice or --

15          A    Yeah, we'd submit an invoice, and we'd have what days we were on travel.  
16    And, obviously, I mean, they vetted it and everything. But, yeah, we would submit our  
17    expenses and charge our time.

18          Q    Okay.

19          So I want to move, kind of, towards the beginning of your work for Women for  
20    America First, or your volunteer efforts with them.

21          When did you first come to meet either the Kremers or somebody from Women  
22    for America First?

23          A    The first time or leading up to January 6th?

24          Q    Let's talk about the first time.

25          A    In general? Okay.

1           I don't remember a time, but it had to have been in 2017, back in the early days of  
2 the administration. I met Amy and Kylie Jane Kremer with their group.

3           And they're fantastic people. Amy Kremer has a history of just being one of  
4 those grassroots moms, like, supermom that goes out there and, you know, loves her  
5 country and found a way to mobilize and get people engaged with their political process.

6           And so I had a great working -- and friendship. I mean, it's just not work, right?

7           At the end of the day, I had ethics pledges and things I had to abide by, right? So there's  
8 a certain point where you meet people -- but you meet people when they're there, you're  
9 friendly, and you move on.

10           I took my ethics pledge seriously. I didn't screw around. I know how frickin'  
11 aggressive Congress was back then about persecuting Trump supporters, and it was a  
12 dick-ass move back then, because there's not the same standard of behavior for the  
13 administration before or current, right?

14           So I made sure, if I met people, I said hello. I'm a friendly person. I talked to  
15 them. I know what I signed up for. I don't want anything from anybody. Okay?

16           They're good people. Our country's based off of good people. And it doesn't  
17 mean you have to be an asshole and swindle and do backroom deals, because apparently  
18 the left and the right does it and it's good politics apparently.

19           Q     Was there a specific event in 2017 that you met the Kremers at?

20           A     Not really. No. I mean --

21           Q     Okay.

22           A     Yeah, I don't know when, like I said, the first time I met them or anything like  
23 that, but --

24           Q     Let's take the time period from 2017, when you first met them, to November  
25 2020. We'll talk about anything later in a little bit. But what sort of volunteer work or

1 other work did you do with Women for America First during that time period?

2 A Oh, none. I've never been associated with the organization. I never  
3 represented them. I never pushed them. I know Amy and Kylie on a personal basis,  
4 and that's it. So I had no connections or any affinity towards that organization while my  
5 tenure at the Department of Interior.

6 Q Okay.

7 Then let's talk about the November 2020 time period. So I know you had told  
8 me previously that you attended the November 14th rally in Washington, D.C.? Is --

9 A Yes.

10 Q -- that right? Okay. And were you volunteering for Women for America  
11 First at that time?

12 A Yes.

13 Q Okay.

14 A So that this is clear, I had no idea who was running that event on Saturday.  
15 All I knew, that there was a big event going on in D.C., and for the first time I didn't wanna  
16 do shit. I was working busting my ass doing events and making big things happen. I  
17 was tired. I didn't wanna necessarily do that. I wanted to just be a part of an event  
18 and just hang out and just be a regular person.

19 And then I ran into them in the lobby, and then I went and saw Amy and found out  
20 they were doing the event. So, at that point, "Put me in, Coach." I mean, I felt like I  
21 wanted to do something with a group I adored and liked. And so I just volunteered and  
22 helped them do what I did for the campaign, which is advance and be a lead event  
23 coordinator and put on a good show, keep people safe.

24 Q So that's November 14th, the day of the event, you ran into the Kremers.  
25 And then they, kind of, brought you in to do some work on that day?

1           A    Yeah.  And like I said, this was very off-the-cuff.  You know, I met them  
2   the night before.  I had no idea even that they were the ones doing the event.  I never  
3   looked it up on social media, never looked it up online.  All I knew is that there was  
4   going to be a big event in D.C., all right?

5           So I was in town, and I was just gonna go grab a drink at the Willard right before.  
6   And the next thing you know, I run into them.  And I was like, oh.  Well, you know, I  
7   want to make sure this is a successful event, and I just ended up -- it just flowed  
8   organically.  I wasn't planning, scheming, doing anything.  I asked if they needed a  
9   hand.

10          I'll be honest -- and this is a good interjection.  Cindy Chafian almost derailed that  
11   entire event to begin with, because she canceled the Supreme Court stage, based off of  
12   what facts or information, I have no idea.  But we don't have a March for Trump if we  
13   don't have an event going on at the Supreme Court, because the whole thing was a march  
14   for Trump.  What kind of march or what kind of event would you have if you don't  
15   actually march, right?

16          So, if the women march can go up there and Madonna can talk about burning  
17   down the White House or whatever, we should be able to do a peaceful march like we  
18   have in our Nation's Capitol for centuries.  So a peaceful march is a march.

19          And so Cindy Chafian almost derailed that first one.  And I made sure to implore  
20   Amy to have a stage at the Supreme Court, and I was the one that met the vendors there.  
21   And that's how I got started.

22          So, when I found out that they had a stage, that they finally got, potentially, their  
23   stage back at the Supreme Court, despite Cindy Chafian's attempts to sabotage it, that's  
24   how I got in.  And it just started snowballing into me just helping out from that day.

25          Q    Okay.  So it sounds like, then, you got involved on the morning of the 14th.

1        You then --

2            A    I would say no -- let's back up. It was definitely the -- we need to talk about  
3    this. Because, again, guys, I'm trying to give you the best of my information from  
4    recollection and everything --

5            Q    Understood.

6            A    -- so -- it's important.

7            So the day before is when I met Kylie and Amy, found out they were doing an  
8    event. Well, guess what. They had to have a meeting with their social media  
9    influencers -- I'm doing air quotes when I say "social media influencers" because I hate  
10   social media influencers.

11           Everybody is a diva. I hate social media. It's all fake. It's crap anyway. Only  
12   about 4 to 7 percent of the U.S. population is even on social media. So I think it's a  
13   waste of time. And I was busy working in the administration; I didn't want to have social  
14   media. So I don't really -- I didn't dive into it until recently.

15           So we had to have a discussion with the social media influencers because there  
16   was somebody, specifically Ali Alexander and Stop the Steal, that created a website, was  
17   taking credit for the event in Washington, and started fundraising off of it, despite the  
18   Kremers pulling the permits, getting the vendors. It's all their liability. And some  
19   asshole named Ali Alexander, who I'd never heard of really until that day, was being a  
20   dick, made his own website, was trying to force Stop the Steal into the rally, and started  
21   fundraising off of it.

22           Because if you're in the private sector, that's called stealing. You can't have an  
23   idea, fundraise, and then have somebody else come up with the same idea, and then you  
24   give them money instead of the original organization. But in politics it's called a good  
25   idea apparently. It's so stupid.

1           And Roger Stone is the scumbag that enabled him and created Stop the Steal,  
2       admittedly. And he let Ali Alexander have it. So, once he created stopthe steal.us, the  
3       first thing we had to do before the next day's event is have a meeting with the social  
4       media influencers. And we tried to do it politely and respectfully. But I knew, talking  
5       to Kylie, that it was Ali Alexander, that scumbag, that was being the one person out of the  
6       whole group that was ruining it all.

7           Because we were there to get along and get a big event together. After the  
8       November 3rd election, the American people were confused. They didn't know what  
9       was going on. I'm coming from a third-world country and background where FMLN and  
10      Castro's influence has rigged many elections across Central and South America. Okay?  
11      Go ask the Gallardos and the cartel in Mexico in the '80s. So, if you people think that  
12      there's no election meddling that happens in the world, you guys are idiots. It just got  
13      here to the United States of America.

14      Was the election stolen? We can talk about that. That's another discussion.  
15      But the American people had questions. And it's fair to ask questions, not be ridiculed  
16      and demonized.

17      So, by the time we did that first -- "Million MAGA March" is what the media kind  
18      of put it as and that first March for Trump, there was wind back in the sails of the  
19      American people that said, hey, we're not alone in questioning this. Right?

20      And I think that kind of snowballed in the momentum, from my understanding -- I  
21      wasn't privy to all the conversations behind the scenes. Dustin Stockton was one of the  
22      assholes that I think derailed and confused and caused a lot of chaos. And who knows  
23      who he was really reporting to. It was probably Steve Bannon.

24      But I have reason to believe that even the good intentions of what Women for  
25      America First and the Kremers wanted to do to move forward -- to just garner

1 momentum for the American people and have a free and fair discussion about what  
2 happened, that's all we wanted to do.

3           But Ali Alexander wanted to fundraise, create his own movement, and create  
4 himself as the star of the show. That idiot had, like, 12 security guys to himself at that  
5 November 4th rally. Big goons. I do private armed security, okay? I'm not making  
6 fun of all these Neanderthal-looking, big, goon-looking types, but he had some frickin'  
7 sorry guys, just to make himself a spectacle and to protect his little social media friends  
8 and his buddy, Michael Coudrey.

9           Q     So it sounds like, after you got involved with them --

10           A     So -- and we had a conversation -- I'm sorry; that's what I was just wrapping  
11 up -- we had a conversation with all the social media influencers, and we had to call them  
12 out that it was not right for them to be fundraising money and creating themselves as the  
13 idea and the people that created the event, when in reality they weren't.

14           Because Women for America First pulled the permits. They paid for the vendor.  
15 It's their liability if something were to go wrong. And it's not right for Ali  
16 Alexander -- and he was standing right in front of me, and I was wearing my campaign  
17 jacket at the time just to be a dick and let him know he's nobody. Because I'd never  
18 heard of him before. I've found out a lot about him. But that's called being a con artist  
19 and a scumbag. And in politics, he made it to the top, apparently.

20           And he was battling between the Kremers, trying to steal credit for all the D.C.  
21 events, until he hid in his basement, or his house, the months after January 6th. Now he  
22 doesn't want to be associated with it.

23           Q     So I understand after the November 14th event and then going into the  
24 December and January events, obviously the relationship between Women for America  
25 First and the Kremers and Mr. Alexander was not the best relationship. Is that the

1 source of, kind of, the animosity moving forward after November 14th?

2 A Listen, the animosity was created by him. You don't treat people the way  
3 he was treating people, okay? Because Roger Stone being behind him and trying to help  
4 Ali Alexander assert himself and influence what was going on was by design, in my  
5 opinion, looking back. Okay? They teamed up with the Jericho March to take  
6 attention away from the December event. Okay?

7 And, then, in order to try to get together and get along and just rise above the  
8 stupid inside drama and bullshit that he created, I think January 6th, they were just trying  
9 to marry orgs and do things together just not to embarrass the entire movement. Okay?  
10 Because, in politics, you kind of have to keep up faces a little bit.

11 And that guy took advantage every way he could to dirty things up. And he  
12 raised an event -- or raised money, \$180,000-plus, for an event that he did not have. He  
13 could've had his little soapbox frickin' speaker -- I do events too. He didn't have any  
14 intention of going there.

15 Q So I'm just trying to understand what you did on that day. You participated  
16 in this meeting with the social media influencers --

17 A Yeah.

18 Q -- went to the stage at SCOTUS --

19 A Uh-huh.

20 Q -- to kind of help set up --

21 A Help set it up, yeah.

22 Q -- and make sure that was going on. Did you do any other sort of work on  
23 that day?

24 A Oh, yeah, dude, I did the whole frickin' event, man. What are you talking  
25 about? When I do advance, I do it till the end. Okay? I was the first one there in the

1 morning and the last one to leave it, at the Supreme Court.

2           Because I went back and set up the stage at Freedom Plaza.  We had, like, an  
3 hour and a half to set up a whole frickin' stage because the police were blocking off the  
4 vendor from being able to come, so it took them, like, 45 minutes, an hour, to get there.  
5 And so I had a bunch of Americans, and it looked like Somalia robbing a U.N. truck,  
6 because we had a bunch of people coming in and carrying stuff out of the U-Haul truck  
7 and having the vendors -- because we only had an hour and a half to set it up before our  
8 first speakers.  It was something like that.  And we got it done, because that's what I  
9 frickin' do, and I kick ass at my job.

10           And I'm looking at security, and I'm looking at the infrastructure and what people  
11 are doing inside, all right?  So that's why I know a lot about what was happening behind  
12 the scenes, because I pay attention and I run events and I do a good job doing it.

13           So I saw that whole thing through, from the Freedom Plaza.  In the middle,  
14 before the speakers were finished, in the middle of it, I went to the Supreme Court,  
15 before everybody went over there, to set that area up, to make sure that when they  
16 actually had a march -- I even gave a banner to some people that we just got organically  
17 from the crowd.  I think it said something, "Women for Trump" or "Women for  
18 America," I don't even know.  But I just set it up, turnkey ready.  You guys go.  This is  
19 what you're going to do.  This, that, or whatever.  And then I helped kind of spearhead  
20 how the whole flow of the event was going.

21           This wasn't some mastermind plan that they had organized.  It was all organic.  
22 Thank God I was there.  I don't know how the hell that event would've happened  
23 without me.

24           In fact, when Donald Trump actually deviated off his course and went through  
25 Freedom Plaza, I had the wherewithal, knowing that he kind of left the Secret Service

1 behind -- because they were supposed to go the original planned route -- and I had to run  
2 in front of everybody getting -- the vendor getting set up and staging and audio  
3 equipment and lights and everything -- I had to run in front of the Secret Service caravan  
4 to get people out of the way, because they were standing in front of the caravan.  
5 Because you don't want to have to stop, right?

6 So I had, in the middle of that, ran, sprint, telling people to get out of the way.  
7 And there's literally a view of me on FOX News with my campaign jacket that says  
8 "Funes," you can't see my face, and right behind me is Trump.

9 So I know what's going on when things are happening. I'm paying attention.

10 Q I want to talk about two individuals that you mentioned. And I just want to  
11 focus on, kind of, what their role was at the November 14th event. We'll have lots of  
12 opportunity later to kind of talk more broadly about them.

13 But you mentioned Dustin Stockton. What was his role there, as far as you  
14 understood it, on November 14th?

15 A Listen, I've never met or heard of that guy before in my life. He looks  
16 creepy. There's nothing dirtier than Vegas and Nevada politicians --

17 [REDACTED]. Wait. Stop. You're saying you've never met or heard of Dustin  
18 Stockton before?

19 The Witness. That's correct.

20 [REDACTED]. Before November 14th. Is that what you mean?

21 The Witness. Yes. Yeah.

22 [REDACTED]. Oh, before November 14th.

23 The Witness. Yeah, yeah, yeah.

24 [REDACTED]. Okay.

25 The Witness. Yeah, yeah, yeah. Oh, I'm sorry. Yeah. I just meant, like,

1 before that, that was the first time I had met him, right? So I didn't know who he was.

2 Dustin who? Right?

3 Apparently he's Steve Bannon's boy. He's super-tight. He was so close-knit  
4 with Steve Bannon -- this is his own mention. This is his way into everybody. Because  
5 when I'm setting stuff up and we're on the bus tour, people are like, who's Dustin  
6 Stockton? Oh, that's Bannon's guy. Oh, Bannon's investing and helping us on the bus  
7 tour.

8 I don't know the actual -- that's what I just hear. That's what these people are  
9 telling me. Apparently he's signing checks for stuff, Dustin is. So that's Bannon's guy.  
10 He self-admittedly and just went out there saying, basically, that's Bannon's bitch right  
11 there. Okay?

12 So what are his connections directly, and how directly? Well, he was getting  
13 investigated by the Southern District of New York, as well, when all the "we build the  
14 wall" drama was going down with Steve Bannon. And I've been to that wall. And you  
15 know what? I think they probably did take some money. All right? They fucked up a  
16 good project and what was meant to be good, just like these opportunists have been  
17 doing for a long time.

18 So I've never met Dustin before until that time, but he was one of the principal,  
19 kind of -- Amy, in my opinion -- hindsight's 20/20 -- made the biggest mistake of leaning  
20 on him heavily a lot to help coordinate and to make things happen for the bus tours.  
21 Because he was part of the Tea Party Express back in the day, and he's all about the bus  
22 tours, and he knows how to do bus tours, right?

23 So, listen, I just got done doing a bus tour for the campaign. I know how to  
24 fucking do that shit, okay? But go ahead. Do your thing, right? I'm just going to be  
25 here for advance and do game-day operations. And I don't want to deal with the drama

1 that's going on between the Chafians, the Kremers, with Dustin.

2                   And when you're on a bus with people for extended periods of time, everybody's  
3 kind of at each other's throats after a few days, you know? A lot of stress, a lot of  
4 coordination going on, and a lot of pressure on us to do well -- that we put on ourselves,  
5 right?

6                   Because we saw a need. The American people had questions, and we thought  
7 we were a conduit to making things peaceful and drawing attention to an issue that  
8 everybody had -- it's the elephant in the room -- after the November 3rd and 4th election.  
9 What happened to the election? Was it stolen? What happened?

10                  We're America. We should be allowed to ask questions and talk about it. You  
11 shouldn't be persecuted as some frickin' radical crazy. Because the people that do that  
12 are the problem. Because now you're just not listening. And if we're going to have a  
13 democratic and political government that actually works and means a damn, then we  
14 should have the right to petition our grievances.

15                  Q    So Dustin Stockton, you understood him to be there sort of as a  
16 representative of Steve Bannon, and he was also financing some of the operations.

17                  A    Yeah. It looked like he was using Bannon's cash pockets to help fund the  
18 bus tour. What, how much, the details, I don't really know. But I do know that,  
19 apparently -- he said it was Mike Lindell, but I was the one that got RMS Security  
20 recommended to him through my private armed security contacts. Who wrote them  
21 the check? Was it Lindell, like he said? Was it Steve Bannon? Or was it Dustin,  
22 playing with other people's money and then choosing who -- and pick to choose who's  
23 going to pay for what, to leave a paper trail to paint people a certain way? Kind of like  
24 they did to me on the permit.

25 [REDACTED]. So --

1 [REDACTED]. Just to clarify --

2 [REDACTED]. I --

3 [REDACTED]. Just one quick question. Sorry.

4 [REDACTED]. Go ahead, [REDACTED].

5 BY [REDACTED]:

6 Q Just to clarify, RMS Security, you made that recommendation, and they hired  
7 them, not for the November 14th rally?

8 A I think it was for the bus tour.

9 Q For the bus tour.

10 A For the bus tour is kind of when they first got started.

11 Q Okay.

12 Go ahead, [REDACTED].

13 [REDACTED]. Yeah. So, just to confirm -- and we might have to do this a few  
14 times, so -- we just want to clarify, when you say -- like, how is it that you knew or what  
15 gave you the impression about Dustin's role in particular? Like, did you talk to Dustin?  
16 Was this from talking to the Kremers? Or was this just based --

17 Mr. Funes. This is --

18 [REDACTED]. -- on your own observation; that's what you kind of put together on  
19 your own?

20 Mr. Funes. Yeah. It's very difficult to take one verbatim sentence,  
21 conversation, and say, "He said this." Okay? I was with the guy for so long. But his  
22 whole mantra and his whole schtick to people in speeches was that he worked for  
23 Breitbart and he was close with Steve Bannon.

24 From what I knew, Bannon, Right Side Broadcasting, Lindell, potentially  
25 D'Souza -- I don't know who was giving what -- was sponsoring the bus tour.

1           Listen, I hate money and dealing with money. It's probably why I'm broke,  
2 because I don't know how to monetize politics. I'm just trying to do the right thing.  
3 And I don't have to get paid to do the right thing.

4           So the devil's in the details, and I wanted to stick away from that. Because I  
5 could already tell and know that something is going on; I don't want to deal with it.  
6 And, again, I don't like dealing with people's money, their donations. I'm just here to  
7 execute my job, and I'm not charging you to do that -- because I got paid handsomely to  
8 do that for the campaign -- because I'm a man of the people and I understand and I want  
9 to be part of this movement, and that's that.

10           BY [REDACTED] :

11           Q     Thinking back -- because I know you said you hadn't met Dustin Stockton  
12 before. Thinking back to the 14th, do you recall how he was introduced to you or how  
13 he introduced himself?

14           A     I think he was just one of the people that I met that was in the suite, that  
15 was in the room, and him and Jennifer Lawrence, you know, Cindy Chafian -- that's the  
16 first time I've ever met her -- and maybe just a handful of others. And Scott Chafian,  
17 okay, was roaming around. Did I meet Robert Patrick Lewis that day or the next? With  
18 Praetorian group. I don't know.

19           No, we did have a little security meeting that night, as well, with Scott Chafian.  
20 So, at the end of the day, Scott Chafian was the head of security on the ground. Chris  
21 Ragone was one of those other point-of-contacts that Scott told me was one of his go-tos.  
22 And I know they were working intimately with Robert Patrick Lewis and the 1A Praetorian  
23 group, which I never really heard of before until that. But their schtick and their story  
24 was that, "Oh, those are Michael Flynn's security guys. You can trust them. They're  
25 Michael Flynn's guys. Michael Flynn's gotta be good, right?" Fucking asshole.

1 BY [REDACTED]:

2 Q And so when you say "they're" Flynn's security guys, you mean the 1st  
3 Amendment Praetorians?

4 A Yes. Correct, sir.

5 Q And just to clarify so it's clear, is Robert Patrick Lewis associated with 1st  
6 Amendment Praetorians?

7 A Yes.

8 Q And is Scott Chafian associated with them?

9 A I don't know his associations or what he does and his history. He told me  
10 he did Naval special warfare stuff. Like, I found out about it afterwards. Like, oh, shit, I  
11 remember him telling me he did some stuff, like counterinsurgency --

12 Q Right.

13 A -- from what I recall.

14 Q But Scott Chafian, that's Cindy Chafian's husband?

15 A Yes.

16 BY [REDACTED]:

17 Q And so he's involved, one way or another, with helping to organize security --

18 A No.

19 Q -- for --

20 A He was just the head of security. Whether he wants to admit -- or they  
21 want to admit it, or I don't know what conversations you've heard before. Scott Chafian  
22 was the go-to for security on the ground for the D.C. events.

23 Q Okay.

24 A And then you --

25 A The 6th I have more questions on, because I wasn't intimately involved with

1 that planning. But Scott Chafian and Robert Patrick Lewis, the 1A Praetorian group,  
2 were essentially the heads of security.

3 And what they did behind the scenes, I don't know. I tried so hard and so many  
4 times to get involved with discussions about safety and security -- because that's what I  
5 do, right? In my world, when I do advance, if everybody goes home safe, we had a great  
6 event. Everybody else is a plus after that.

7 I give a damn about people's safety, especially in D.C., given the provocateurs and  
8 the nature of these events and the lightning rod they could be. So, when dumbasses  
9 like Proud Boys are walking around frickin' Freedom Plaza saying, "Fuck Antifa," yeah,  
10 haha, that's cool, but you guys are idiots. Like, we're not here to cross heads and do all  
11 that.

12 I want people to be safe. I wanted to know what was going on with security. I  
13 asked Cindy Chafian, and she was blocking me so many times from my attempts. I didn't  
14 want to deal with the wrath of that bitch, to supersede her and talk to Scott, because I  
15 easily could have and talked to him, but I would've had to deal with that woman's dumb  
16 ass the entire time of the bus tour, and I just didn't want to deal with it.

17 So, if you want to cut me off from having conversations about planning and  
18 something I can contribute and help with and you just want to be a dick and hijack that  
19 and keep your husband in charge, fine. Because, when it comes down to the day of,  
20 yeah, I was the guy that had access to everything and could do anything I needed,  
21 because I'm the advance guy.

22 I barely had to reach and network and learn the security teams that day. So, if  
23 this person telling me that person's good and that person's telling me this person's good,  
24 okay, fine. I don't know if they're Oath Keepers, if they're Praetorian group, or they're  
25 Guardians of Freedom or Three Percent-- I don't even -- I heard of most of those groups

1 for the first time when I was doing the D.C. events. Right?

2 But because of Cindy Chafian excluding me from the conversations, I had to learn  
3 security and what was going on with security and personnel of the security basically the  
4 day of, most of those events.

5 Q So one other -- the other name you mentioned I just want to clarify. You  
6 mentioned Chris Ragone?

7 A Yeah.

8 Q Who I think is affiliated with a company called Executive Security Concepts?

9 A Sure.

10 Q Does that sound right? Did you know that? I mean, you may not know  
11 that one way or another. But you mentioned him -- the only reason I'm asking for  
12 clarification is, it sounds like you mentioned him in the same breath as 1st Amendment  
13 Praetorians, and I just want to get clarification, to the best of your knowledge, whether  
14 he's just a security guy who happened to be in the works the day of or if you understood  
15 him to also be affiliated with 1st Amendment Praetorians.

16 A Let me just be clear. If you guys aren't aware of it now in this part of your  
17 investigation, that security teams and people posing as security were weaponized -- like,  
18 you guys know that, right?

19 Q I'm literally just asking you what you understand that --

20 A I don't know how you cross-pollinate groups and their affiliations with the  
21 individuals. If this guy handed me a card and said, oh, I'm with this group or whatever, I  
22 don't know you, dude. You could have whatever on this card.

23 I don't know these people. At the end of the day, I don't know these people. I  
24 worked with them politely and respectfully because I had a mission to accomplish, and  
25 that was doing events in D.C. and keeping people safe.

1           Further than that, Robert Patrick Lewis is a scumbag piece of crap. I didn't know  
2           that at the time. Only after investigating and chasing him down, and he was giving me  
3           false information after January 6th. And I didn't trust him, especially after he frickin'  
4           basically blackmailed people for information and made people's lives miserable through  
5           his 1A Praetorian group. So you've got to put the leadership accountable for what 1A  
6           Praetorian group members do, right?

7           So I think he's a piece of shit, and I wouldn't trust him with my kids or with family  
8           or with anybody. And they pose as patriots and Americans and the heads of Michael  
9           Flynn's security team. I don't know who those people are. I made the mistake of  
10           actually interacting with them, thinking that they were good people.

11           I even made the mistake of inviting one of those guys to go with me to the January  
12           20th event at Joint Andrews Air Force Base when I come to attend Trump's last event as  
13           President, thinking that 1A Praetorian is actually a good group. If Michael Flynn could  
14           trust them, so could I. I couldn't have been more wrong.

1

2 [12:10 p.m.]

3 [REDACTED] So, again, you mentioned Chris Ragone. I'm just asking, in that  
4 moment, right, putting yourself back in those shoes, what you -- just to the best of your  
5 recollection -- what you understood his role to be. That's all I'm asking.

6 Mr. Funes. I know that he was the right-hand man or one of the little clique of  
7 good old boys that Scott Chafian was using for the D.C. events on the ground. Chris  
8 Ragone is one of his right-hand men, that he told me and introduced me to him as that.  
9 "Hey, if this guy's, like, talking to me, if you need anything, you let him know and he'll  
10 make it happen."

11 So the November 14th event, that's the first time I was introduced -- on the  
12 ground. I might have had -- like I said, that's the only time I was actually involved with  
13 the security meeting, basically, was before the November 14th, because I asserted myself  
14 and I knew what was doing, they knew I was sharp, I got it. And then after that, I never  
15 was really involved with security or planning. I just had to do things day of off the cuff.

16 BY [REDACTED] :

17 Q So I just want to clarify who was actually involved in the security meetings  
18 for the November 14th rally. We've got Scott Chafian, Chris Ragone, members of or  
19 people from the 1st Amendment Praetorians. And then it wasn't until later that RMS  
20 Security became involved.

21 A Yeah. RMS never was involved until the bus tour, as far as I'm concerned.  
22 As far as I'm concerned. And, again, I don't know if I'm like -- do you guys tell people  
23 that I'm your source for information? Can you guys make sure to keep me as a source  
24 kind of confidential as your investigation goes?

25 Q At this point, these are -- this is internal. The transcript of our interview

1       remains internal. At some point some of the facts may be used in a report later on.  
2       But that's essentially our process.

3           A    Give Rudy Giuliani hell when he comes in next week.

4           Q    So let's -- I'm actually going to show you a quick document. I'm going to  
5       hand you this binder. There's a few exhibits in there that we'll reference throughout  
6       today, and most of them are just kind of to nail down a timeline or help you remember  
7       when certain things happened.

8           And if we can look at tab 2 in that binder.

9           A    And, again, Ragone's, just so for clarity, just one of the people's names that I  
10      remember.

11          Q    Sure.

12          A    He gave me his card. He left me a voice mail one time. And like I said, the  
13      reason I remember him specifically is because Scott Chafian said that that's basically his  
14      dude. He had a conglomerate of good old boys that potentially had worked with before.  
15      But that's just for clarity just one of the people I've --

16          [REDACTED]. Sure. And, Jason, you've been candid and we appreciate all that.  
17      Just so you understand, when we ask particular questions, you shouldn't read that one  
18      way or another.

19           I understand your viewpoint on things generally, as you put it out at the beginning  
20      of this interview, but I just want to make sure you understand that as we're purely  
21      investigating facts.

22           And when we talk to people who were on the ground for events that [REDACTED] and I  
23      weren't there for, you can imagine, as I'm sure you, sharing stories with friends,  
24      reconstructing events as they've happened, you could have five different people.

25           And we're just trying to get a 360-degree view as best we can looking over our

1       shoulders at the past, which is why we're asking you particular questions.

2           And so I say all of that just to preface, all we're asking is what you understood at  
3       the time. And I understand that there's been a lot of work you have done following  
4       these events.

5           Mr. Funes. Yeah. Because that's -- yeah.

6           ██████████. So it's a little tough to sort of, like, divide between what you know  
7       now versus what you thought. A lot of times we're asking, what did you understand at  
8       the time?

9           Mr. Funes. Yeah. And I appreciate that. I think, even for me, that's what  
10       made coming in today so challenging, because I'm trying to be fruitful or like truthful, and  
11       that's why I'm trying to swear an oath, because, like, listen, I want to be transparent, but  
12       sometimes, like, at the moment, I knew, you know, little to, you know, so much, right?

13           And then a year afterwards and after dealing, and hindsight's 20/20, and then you  
14       look back, it's like oh, my gosh, what was going on, you know. And that's why I'm trying  
15       to be kind of as detailed myself just to clarify, like, you know, because I have to think back  
16       and kind of recall, too, like, where was I on knowledge at that point compared to today.  
17       So that's why I guess also I try to explain in a roundabout way.

18           ██████████. Got it. I think some of these exhibits will help because they will  
19       sort of put us back in the shoes of in particular moments and kind of help focus us on  
20       what you understood at that time.

21           So sorry for interrupting, █████.

22           ██████████. Yeah. And so that's sort of the point of this exhibit.

23           If you can actually flip just to the last page of the exhibit. These are some text  
24       messages between you and Kylie Kremer and Amy Kremer. And if you just flip to that  
25       last page. I'll give you a minute or two if you want to look through.

1 [REDACTED]. The way that these -- this document reads is it's in reverse  
2 chronological order. So when you go to -- the very last page is the first text message in  
3 the --

4 Mr. Funes. Oh, yeah, because I'm looking at the dates. They're all messed up.

5 [REDACTED]. Yeah. It's just in reverse.

6 Mr. Funes. Got you.

7 So this was group text message that you guys got ahold of?

8 [REDACTED]. That was produced to us, yeah.

9 BY [REDACTED] :

10 Q So that last -- so it's actually just about two-thirds of the way up the page  
11 that hopefully this will kind of remind you of the timing of certain events. It looks like at  
12 7:53 a.m. on the 14th -- or actually sorry, 9:30 a.m., the next text above, "Can you let  
13 Scott know I got caught up with staging and won't make security meeting."

14 That's a text from you to Kylie and Amy. So does that remind you, was there a  
15 security meeting the morning of the 14th?

16 A There's supposed -- yeah, there's supposed to be, like, I met like I told you  
17 guys the day before, there was, like, a kind of brief, kind of run over. We're supposed to  
18 meet the entire team that morning of, but, like I said, we got caught up at the Supreme  
19 Court. I was supposed to set up the stage, go back, do the meeting, and meet the  
20 vendor again at the Freedom Plaza to run the event, but I just got so tied up and  
21 backtracked that, like I said, I do private security. I'm trying to keep people safe.  
22 That's what I feel my responsibility is when I do advance, no matter for who it is. And so  
23 I was just, yeah, at that point in time, like, "Hey, I'm not going to make it."

24 Q Okay. And that's Scott Chafian that you're talking about?

25 A Yes, I'm referring to Scott.

1           Q    Okay. And do you know who else was supposed to be at that meeting?

2           A    I was supposed to meet everybody. That was going to be the, you know,  
3       my introduction to everybody in face.

4                 The next time that happened was, basically, the November -- I'm sorry -- the  
5       December 12th event where we kind of had a prebrief like the night before. But, yeah,  
6       that was where I was supposed to meet everybody, but didn't. I kind of just met them  
7       all on the ground ad hoc as I was going.

8           Q    Okay. I think you might have mentioned that there was a meeting later  
9       that night with the security team --

10          A    No.

11          Q    -- where you just -- okay. Got it.

12          A    Yeah.

13          Q    Okay. All right. So then other than the people that we've already talked  
14       about, you don't recall anybody else that worked security during that event.

15          A    No. Listen, American patriots thought that by dressing up in bulletproof  
16       vests and being the militia-type of people, that sent a good message and representation  
17       that, you know, the event is safe and secure. And if that's all they have to keep us safe  
18       and secure, I'm going use anybody I can to keep people safe and secure. I don't know  
19       who you are.

20                 Half these guys all look alike after -- they're all disheveled beard and bulletproof  
21       looking vest, you know. So if people -- a lot of people met me and knew who the hell I  
22       was. I was, like, "Oh, yeah, thanks. It was a pleasure working with you, too, thank you  
23       for what you're doing," you know, because on the day of, I can't remember everybody's  
24       names and stuff. But I'm good at my job and I was everywhere.

25          Q    Okay. So I think we've talked about security or covered security. One of

1 the other topics I wanted to discuss that we've touched on is just --

2 A I can take my notes with me?

3 Q You can take your own notes with you, yeah.

4 A Okay.

5 Q One of the things I want to touch on was this disagreement between Ali  
6 Alexander and the Kremers and anybody else involved.

7 So I think previously you described that as sort of a disagreement around Mr.  
8 Alexander using the Women for America First event to raise money for his own  
9 organization. Is that accurate?

10 A Yeah. And he was taking credit for the event in itself via social media.

11 Q Okay.

12 A Right? How and what he was doing, the exact messages. I never read  
13 them. I didn't go through them.

14 But it wasn't just Kylie and Amy. A lot of the other people were saying, "Hey,  
15 that's fucked up, like, he shouldn't be doing that."

16 So I didn't have any reason not to believe that that's what he was doing. And, in  
17 fact, he proved exactly that he was doing that every day after that.

18 Q Okay. And then, I think, maybe then that's helpful context to understand  
19 some other text messages in this exhibit No. 2.

20 If you can flip back towards the front of the text messages, so kind of advancing in  
21 time a little bit to November 19th on page 2.

22 And I'll give you a second to look at this page just to orient yourself.

23 A Yeah.

24 Q But I'll tell you that this is on the 19th, you're discussing potentially going to  
25 an event in Georgia that Mr. Alexander is present at.

1           A    Uh-huh.

2           Q    And then I'm just going to go read to you and for the record what Kylie says,  
3 and this is in reference to the event in Georgia with Mr. Alexander.

4           "Okay, but we do not want to go there on behalf of anything with us. I would  
5 prefer you not to go if you want to do the tour with us. We CANNOT be," and cannot is  
6 in all caps, "be a part of anything that is going on there."

7           Can you just give me some context for that? Why did -- why was Kylie so  
8 insistent that you not go to this Georgia event?

9           A    So she was right. Ali Alexander planted his flag in the Georgia State Capitol,  
10 figuratively and literally, as soon as he got there and he raided the Georgia State Capitol  
11 Building.

12           Women for America First was planning on doing an event that weekend with  
13 speakers. There's a special election going on and they were planning to do something  
14 on Saturday. But as soon as Ali did that and created mayhem and chaos, like, we don't  
15 know what he was going to do. It's an unsafe location. It's right on the street. We  
16 didn't want things to get out of hand.

17           I was thinking of just going down there just to go down there because I was with  
18 somebody that was -- we were going to just go to Georgia and go check out the event.

19           I had made plans to go down there because we were supposed to do an event.  
20 And then when we weren't going to, I was, like, well, maybe I should just go ahead down  
21 there anyway.

22           And Kylie can be a little bitch sometimes, but she said to me in a point in fact that,  
23 like, "Hey, like, it's either one team or it's not." And fuck it, definitely don't want to be  
24 associated working with Ali Alexander. So I didn't go to Georgia.

25           Q    Okay. So I just want to understand a little bit more. It sounds like the

1 agreement in November, on November 14th, is a little more about the financing and  
2 who's kind of getting ownership of the event. But then the concern on November 19th  
3 and in Georgia is more about disorganization and the potential for things to go awry at  
4 the event.

5 A Correct. And let me add some context to it. So according to the Georgia  
6 State Building Authority, I think it is, you can't technically get a permit for the State  
7 Capitol Building in Georgia. It's just like the Supreme Court. It's kind of first come, first  
8 served.

9 So even though we were trying to go about things the right way to get a permit  
10 and we're talking to people, I mean, the truth is, they just really can't create a permit.  
11 So we're not going to go in there in a jousting match, go head to head, and try to take  
12 each other out, especially after the first event that we did on November 14th. It  
13 defeated the whole purpose.

14 So they made an executive decision it was probably -- it was smart of them,  
15 looking back, not to go down there and not to muddy the waters in case people got the  
16 misconception that they were working together doing stuff, right? So in hindsight, like,  
17 yeah, they were totally right. I'm so glad I stayed far away, right? But that's what was  
18 going on.

19 BY [REDACTED]:

20 Q So just to build up a little bit more on that. You said -- I just wrote down  
21 the words you used in terms of the concerns being mayhem, chaos, and I think you said  
22 unsafe in reference to the location.

23 A The location, yes, sir.

24 Q Am I understanding you right to say that you thought it would be that if  
25 there were competing events or --

1           A    Yeah.

2           Q    -- you thought it was going to be like that regardless of whether Women for  
3    America First went? Like, was it going to be chaotic even just with Ali's group by itself?

4           A    Yes, yes, immediately, and yes to both. Because looking back, I mean, the  
5    reason we didn't go is because that idiot stormed the Capitol building. What the hell are  
6    you doing? You're making everybody look like idiots. Like, we don't want to be a part  
7    of that.

8           Q    Did you know that was the -- so --

9           A    I only heard it on TV -- or not TV -- or YouTube or Infowars or whatever just  
10   little infamous clip where Ali Alexander calls this guy a hillbilly. I was, like, what the hell  
11   happened? What did these people do? Then I go look in Infowars, whatever, I'm like,  
12   what are you guys doing?

13           And I talked to them, like, did you fucking hear about what they did at the Capitol?  
14   And then we started discussing because we already had planned like adults to have an  
15   event and do something on Saturday.

16           So he alone and his group, we had no idea what kind of chaos would've happened.  
17   If you guys are more than willing to raid a Capitol building on a Wednesday, the first day  
18   you got there, and he was planning to have so-called events Thursday, Friday, leading up  
19   to Saturday.

20           Listen, we're not here to compete. They made the right call by not creating an  
21   event or co- creating an event because it would not have commingled right because of Ali  
22   and the type of people he brings to his crowds.

23           Q    So I think that's helpful clarification, just to make sure that I understand this.

24           You were aware that Ali Alexander and a group with him had gone into the  
25   Georgia State Capitol sometime during the week preceding this Saturday?

1           A    Yeah. I think it was that Wednesday.

2           Q    And then because of that, you didn't want to have anything to do with the  
3    Saturday event where you knew that Ali's group was also going to be holding another  
4    event?

5           A    It was a little bit of both. I think everything was organic at the time, right?  
6    I mean, we had contacts obviously. That's the Kremers' backyard in Georgia. So I'm  
7    sure if they really wanted to do an even they could have.

8           But what was the point? We were trying to build a unity across the entire  
9    country to help build support for Trump. That would've been counterproductive.

10          You know, I'm an event guy. I go in and I do my job. I'll leave the politics and  
11    decisionmaking up to what they want to do, right? So when I was thinking, "Hey, maybe  
12    I should just go down there," Kylie can be a little obtuse in the way she speaks. If you've  
13    spoken to her, you can tell. But, like, okay, yeah. I'm not going to go. Fine.

14          Q    And also just to clarify, you mentioned Infowars. That's because Alex Jones  
15    was with Ali Alexander when he went into the Capitol?

16          A    Yeah, the idiot. Yeah. He's the one that broadcast it. He's the one that  
17    gave Ali Alexander a platform even on Periscope when Ali Alexander shouldn't or can't be  
18    on Periscope and, I guess, which is Twitter's former thing and they don't have anymore.

19          But, yeah, Infowars gave him a platform and Roger Stone built him up so that they  
20    could harness the entire Infowars crowd and make them Ali Alexander fans and  
21    supporters.

22          And, yeah, I didn't know that was going to happen until it happened, and I'm  
23    watching videos of these people looking like idiots. And Vernon Jones even surprised  
24    looking around, like, what the hell's going on.

25          BY [REDACTED]:

1           Q     So was Ali Alexander going into the Georgia Capitol and then that follow-on  
2     event that weekend kind of the first hint for you and for --

3           A     The one where Lin Woods, Sidney Powell. And all that?

4           Q     Was that the first indication for you and Women for America First about this  
5     kind of concern about chaos or mayhem?

6           A     Yeah. I think he did it more internally, like between organizers and  
7     speakers, the first one. But, I mean, gosh, that was like, what, the next week after or  
8     something like that? And it's like, dude, who is this guy? Right? This guy's exactly  
9     who you said he was. This guy's a problem. What's going on?

10          Q     So, I guess, that was kind of the point of my question is, on the 14th, did you  
11     see some of those same concerns about either the tone of his messaging or what you  
12     thought his supporters were willing to do --

13          A     Yeah.

14          Q     -- as compared to Women for America First?

15          A     Listen, as somebody who supports and loves the First Amendment, you're  
16     allowed to go out and say basically whatever you want, but don't be calling and inciting  
17     for violence, right? Madonna, Ali, Infowars, anybody, if you watch the tone and what  
18     the language was from the Kremers and some of -- exclude Dustin, or maybe just Kylie  
19     because Amy doesn't really do the public speaking -- like, the rhetoric was there to keep  
20     things as peace loving, kind of kumbaya.

21          Then you got other assholes going out there, "Fight for Trump," or, you know,  
22     whatever it takes. And the militia groups thinking that, "We have to take back our  
23     Capitol and by any means necessary. It's our constitutional duty and obligation."  
24     You've got Stewart Rhodes writing these big, long documents pretending to still be an  
25     attorney and making his constitutional narrative to justify what his group may or may not

1 do that day.

2 That's just a little crazy. We got to be careful, right?

3 So, yeah, him and his group had some things maybe a little bit more leaning, but I  
4 don't think it was as aggressive on stage and at that event as much as it was Owen  
5 Shroyer, Alex Jones, and Roger Stone bullhorning in front of the JW Marriott next door to  
6 the Willard Hotel. That shit was incendiary.

7 Q On the 14th?

8 A You know, before -- the night before and the night after, they were  
9 bullhorning out in front of their hotel. Right? That's no secret. Everybody knows.  
10 That shit was a little, like, fiery.

11 Q Okay. So just moving back to the November 14th event a little bit.

12 We've touched on Cindy Chafian a little bit. You mentioned you thought that she  
13 was trying to sabotage the event on November 14th by interfering with the SCOTUS  
14 stage?

15 A Yes. So she got it in Amy's head that it was going to be dangerous, we  
16 shouldn't do it, there are so many threats of antifa, and that they were there to create  
17 chaos.

18 I'm like, first off, how does she know what antifa is saying? Like how are  
19 you -- where are your bat channels to antifa, right, that there's going to be provoke chaos,  
20 that we shouldn't do it? What?

21 To pull that string the night before and get it in their head because she was the  
22 security expert because her husband was in charge, right? And whoever's doing  
23 cybersecurity and, you know, physical security. It's all bullshit. Robert Patrick Lewis is  
24 probably spying on everybody's shit, right?

25 So, yeah. She last minute got it in Amy's head that it was too dangerous, we

1 shouldn't do that, and Amy, for the safety of people, pulled the plug. I'm like, dude, you  
2 guys already paid for it. You're not going to get your money back. What do you mean  
3 you told them not to bring the stage? That's stupid.

4 I literally got on my knees, I said, "Amy, please. How are you going to have a  
5 March for Trump if we don't have a march? You guys are going to look like idiots."  
6 And thank God the vendor last minute packed their car with the little things that we  
7 needed and they were there in the morning, surprise even to us kind of.

8 Q When did that conversation happen?

9 A That night.

10 Q Do you recall?

11 A That night, late at night.

12 Q The night of the 13th?

13 A The 13th, yeah. That was one of the last conversations. I was like, "What  
14 do you mean you canceled the Supreme Court stage? That's stupid. How are you  
15 going to have a March for Trump if you don't march?"

16 Q And why -- what do you think Cindy Chafian's motivation was?

17 A Who knows? Afterwards, she's just a corrupter, saboteur, and asshole, so  
18 par for the course for her. I just didn't know it at the time.

19 Q Was she frequently concerned about antifa's involvement or making that,  
20 asserting that kind of concern?

21 A Yeah, asserting that kind of thing, you know, because she was the intel.  
22 And that was kind of her role and responsibility having her husband as security. She had  
23 her ears on the ground for safety and security. Why she was in charge of all that, I have  
24 no idea.

25 Q Can you expand on that a little bit? You kind of described her role as intel.

1           A    Yeah.

2           Mr. Funes.   Can I use the restroom real quick.

3           ████████.   Yeah.   Why don't we take a 5-minute break?

4           Mr. Funes.   Okay.   Yeah.

5           ████████.   So we'll go off the record for 5 minutes.

6           [Recess.]

7           ████████.   I think we're ready to go back on the record.   You ready, Jason?

8           Mr. Funes.   Yes, sir.

9           BY █████:

10          Q    So I think right before we went on a break you were sort of expanding on  
11          Cindy Chafian's role as I think you used the word "intel."

12          A    Yeah.   I needed a little break to get on to her, yes.

13          So it seemed like there was a lot of things happening behind the scenes in  
14          discussions with people outside of the bus and the bus tour.   And I'm not sure how  
15          much Amy and Kylie knew about, but it seemed like Dustin and Cindy were definitely busy  
16          and kind of had their own way things had to be that struck me extremely odd.

17          Because I'm all about planning, I'm all about problem solving, I'm all about  
18          working together, but there just had to be some things that just, "You have to take my  
19          word for it," and just resistance to change that was obtuse, unnecessary, made things and  
20          people difficult to work with.

21          And, listen, I'm used to high-stress environments.   I'm used to people just being  
22          at their throats.   Listen, I just got off the big boy campaign.   This is nothing, okay?  
23          We're just an ad hoc kind of grassroots whatever, right?   I dealt with stress and what  
24          other real life stuff is.

25          So the way they behaved themselves became like a cancer and rotten from within

1 that I don't know what was going on. Again, that's what makes me look back at things  
2 and going -- especially with Dustin Stockton was trying to dirty me up on January 6th and  
3 having me go set up an event at the Supreme Court behind Amy Kremer's back.

4 Like, why are you doing that? Who told you to do this? "I can't believe you  
5 went outside my chain of command or you went above me and you called Amy."

6 I was, like, dude, because I'm not going to go set up an event when we talked  
7 about unity and that's the whole point of having the Ellipse event. So, no, I wasn't going  
8 to just take your word for it.

9 And the reason I wasn't just going to take his word for it -- I was, like, hold on.  
10 So, listen, what you're telling me is that you want me to skip out the Ellipse event. You  
11 won't give me a VIP pass so I can make sure I can come in. And you want me to miss out  
12 on the event I worked my ass off to help create, which is January 6th -- because  
13 everything was leading up to January 6th.

14 I think they may have even known more about that than I did. I don't even know  
15 exactly when all this was conceptualized.

16 But everything was leading up -- I'll be fucking damned if I miss the President's  
17 speech and I don't go attend the rally. And why are we doing an event at the Supreme  
18 Court when Ali Alexander is having his bullshit thing and you guys won. You guys are  
19 having the main show with the President. Why are you trying to compete?

20 And he's calling me January 5th after the fucking Freedom Plaza event that I just  
21 operated. I'm, like, What? Where's this coming from?

22 Q We're going to -- I'm going to attempt to move through these  
23 chronologically, so we're going to get to the 5th.

24 A But that's an example of Dustin Stockton asserting his way of how he  
25 thought things should do, things should operate, and he had his own agenda. And we

1 can talk about it more because I think it was more evident to me in the December event.

2 Q Okay. Right. So I actually want to move to the bus tour as a lead-up to  
3 the December event.

4 So coming off of the November 14th event, how did you get involved in the bus  
5 tour?

6 A Natural organic progression, my willingness to help, and me kicking ass at my  
7 job.

8 Q Okay. And you did -- you've described to me that you did advance work  
9 generally for the bus tour?

10 A Yes.

11 Q Okay. How about working on security?

12 A Again, this is one of the things I've tried to have conversations with all the  
13 time with people. And when we had private executive protection style security on the  
14 bus, it was a little bit easier to coordinate and communicate with those guys on the bus,  
15 because we were working with them every day.

16 So we set up perimeters, we -- I would get there in advance of the bus, and we  
17 would strategize how to keep people safe with the security that we had on board.

18 Q Okay. And the security you had on board for the bus tour, just to make  
19 sure we've got it down, at that point you had retained RMS?

20 A I hadn't retained, but RMS was retained, however it was, whoever paid for it.

21 Q Okay. And you don't know who hired them or who paid for them?

22 A Honestly, I never -- Dustin Stockton told me that Mike Lindell was paying for  
23 security because he wanted to have executive protection on the bus. I don't know the  
24 veracity of that. But that was his original story and that's why I went out there to look  
25 and ask my security contacts who would be a good executive protection group that could

1 get here last minute and get ready for the bus tour.

2 [REDACTED]. So you're somebody who, you've mentioned, you've got security  
3 contacts, you've worked in advance. So in your opinion, was it -- or in your  
4 experience -- was it necessary to have Executive Security on the March for Trump bus  
5 tour?

6 Mr. Funes. You're asking somebody that believes that whatever we have at our  
7 disposal to use. Was it maybe a little bit of overkill? Overkill would've had 12 security  
8 goons like Ali Alexander and bulletproof vests and idiots running around with helmets  
9 pretending to be security. That would have been overkill. Okay?

10 The Women for America First bus tour had a little bit of target on its back because  
11 anybody that didn't like Trump didn't want a bus tour to be successful, right? So out of  
12 the abundance of caution and somebody having a big checkbook that didn't mind paying  
13 how expensive that shit is, yeah.

14 I mean, at the time, sure. I mean, I didn't think it was overkill at the time; I  
15 thought it was handy and great, to be honest with you, because we had professionals.  
16 They looked the part. They were discreet, trained.

17 Some of these guys had some pretty impressive backgrounds, right? Ken  
18 Goodwin, how would he get there?

19 So, again, I don't know who these people were actually brought in from, how they  
20 got to them, or got to the bus tour. We had an excellent group of guys for the most  
21 part, okay? And I appreciated their professionalism and it gave us all an excellent peace  
22 of mind to go about our day-to-day operations having them around.

23 [REDACTED]. That's helpful. Thank you.

24 BY [REDACTED]:

25 Q And so that's RMS. Was Executive Security Concepts or Chris Ragone --

1           A    No, no.  He's none of that.  Fuck that.  Those guys were clowns.  I've  
2    never even interacted with him after the events and everything.  I had had a contact get  
3    me a hold of Zach Rugen.  I spoke with him on the phone, put him directly in contact  
4    with Dustin Stockton.  Next thing you know they're on our buses.

5           And they're waiting for us in D.C. by the time we got there for the December 12th  
6    event, and that's when I met Zach Rugen and Lyndon Brentnall in person.

7           Q    Okay.  But that's all RMS.

8           A    That's RMS.

9           Q    So just wanted to go back.  Executive Security Concepts, Chris Ragone,  
10   when did he come into the equation?

11          A    The only time I saw him was on the ground for the actual events in D.C.

12          Q    Okay.

13          A    And he brought around his own group and his own posse of who knows who.

14          Q    Okay.  And you don't know who brought him into the organization.

15          A    Scott Chafian.

16          Q    Scott Chafian did.  Okay.

17          Okay.  And then, in addition to RMS and Executive Security for the bus, let's just  
18   take the bus tour itself.

19          Was there any involvement of 1st Amendment Praetorians in your security  
20   apparatus?

21          A    We didn't have any amateurs as far as I'm concerned that were directly  
22   associated with the bus tour or on the up and up with the bus tour.  Anybody else that  
23   showed up and how they were coordinated there was between Dustin Stockton and  
24   Charles Bowman.

25          Q    Okay.  We'll talk about or I'll ask you about Charles Bowman in a second.

1           You've kind of talked about some of the group on the bus that were making  
2    decisions and partially about hiring security, but really anything on the bus tour.

3           And I want to understand who that group of people was. So we've got the  
4    Kremers and the Chafians, Dustin Stockton. Who else would you put into the kind of  
5    decisionmaking group?

6           A    I mean, Women for America First had their own board, right? So if  
7    everybody wasn't on the bus tour, the board members weren't on the bus specifically, I  
8    think, from my understanding, they had talked about it, made decisions as a group, right?

9           Was there a lot of executive decisionmaking being made by Kylie and Amy?

10          Sure. Oftentimes I think Amy punted and let Kylie make decisions. I wish she didn't.

11          But I think that decisionmaking was happening. It just seemed like there was  
12    even different factions within our own group, which I always found it odd day to day to  
13    day to day to day being on the bus tour. We're like what the hell is actually -- like, what  
14    the fuck is all this drama and bullshit going on? Like, it almost felt like competing  
15    interests of some sort at times.

16          Not all the time. We responded. We worked hard. I believe in working hard,  
17    playing -- by just having fun responsibly and not being an idiot and making yourselves  
18    look like idiots because we have big -- especially working in the interior, right?

19          I mean, everybody just needs to be careful, right? This is the arena you sign up  
20    for when you work in politics, right? Don't be a jackass.

21          So, you know, we tried to do the best we can to make sure that our people at  
22    these events were acting appropriately. The same standard of conduct that I would  
23    expect at a Trump rally is what would happen, and don't take that out of context either.

24          What I'm saying, if you go to a Trump rally, it's Black, Brown, Yellow, Indian,  
25    whoever. Everybody's getting along. It's a big lovefest. And you often have maybe

1       one or two strays that stand out there and want to make an attention for themselves, and  
2       we kick them out.

3           But anything violence, agitating, talking shit to your neighbor or somebody else in  
4       the crowd, you know, smoking a ciggy in the crowd, "Go step off over here, bro. Come  
5       on." Right?

6           We wanted to keep and we did keep a level of professionalism and, like, just  
7       standard crowd control, right? We were constantly always monitoring and talking to  
8       each other.

9           And if I saw a suspicious character at one of our events when we rolled up, "Hey.  
10       How's it going? Thank you so much for supporting us. Thanks for being out here."  
11       And they get nervous and probably I wouldn't have seen them again.

12           So I'm very direct and upfront with people. But there's a good way of going  
13       about it and not being a dick and getting in their face and like, "All right. What's going  
14       on?" You know, you don't do that. We're not trying to cause attention to ourself.

15       Q     So you had just mentioned Charles Bowman. Can you tell me who that is?

16       A     I don't really know who this guy is. Just like I didn't really know who  
17       Rebecca Bennett was.

18       Q     When did you first meet Charles Bowman?

19       A     On the bus tour. He's one of the people that was kind of Dustin Stockton's  
20       right-hand man. They had a great working relationship, they've known each other for I  
21       don't know how long. Okay?

22       Q     Do you know any more details about how Charles Bowman and Dustin  
23       Stockton know each other?

24       A     Really, I don't, you know. I think I was put into a position where -- and this  
25       is what I did for a year -- I see what's going on. I kind of see things that are funny, but I

1 just keep my mouth shut. Because if I start prying, people get squirrely, and then they  
2 start thinking that I'm like paying attention and noticing stuff.

3 So okay. Yeah. You guys are friends? Cool. We're working. I didn't pry  
4 about their personal business. I didn't go and pry into their family life and ask 20  
5 questions. There's more peace in mind in not getting too involved with stuff like that,  
6 but I did have my questions about a lot of these people's experiences, especially coming  
7 from the highest top level of professionalism when it comes to campaigning grassroots.

8 So bless their heart, I know everybody's trying to do their best, but just something  
9 wasn't going on right.

10 And Charles Bowman had contacts in partnership with us and Stockton. I don't  
11 know how much with the 1A Praetorian group, don't know. But Oath Keepers and  
12 Proud Boys -- or Proud Boys specifically and the Three Percenters and Guardians of  
13 Freedom, I don't know what role they are doing or playing out in the world, okay?

14 I used to think these people were good, that these people swore an oath and  
15 they're just trying to do the right thing. But I think some of these people were a little bit  
16 more that know about certain things than they let on to believe.

17 Q What did you understand Charles Bowman's role to be or what was he doing  
18 day-to-day on the bus tour?

19 A Helping gopher or do whatever Dustin Stockton and Amy needed him to.  
20 You know, everybody -- you know, between running errands, going to go give a ride to  
21 somebody somewhere, picking up equipment. I mean, on a bus tour grassroots, this is  
22 just kind of the nature of the beast, right?

23 I mean, you're the helpful hand if you go out and get food for people, right?  
24 You're a huge help. And how petty people were for just little things and gratefulness for  
25 the people that really didn't really give much effort, but it looked like they did something

1 good for us, right?

2 So looking back, it's kind of curious. I'm not, you know, exactly sure.

3 Q Do you know, other than being on that bus tour, what he did for a living  
4 outside of that?

5 A No. No. You know. Sometimes it almost felt like Rebecca Bennett, for  
6 example, led me up to believe that she had some type of ties to the Central Intelligence  
7 Agency or was a contractor of some sort or worked somewhere in the spook or clown  
8 world.

9 And when you ask people like that, you don't ask them too much questions. So  
10 she led me off to assume that she was on some higher up and she was in the know. And  
11 then come to find out, she's reporting to Jim Penrose and Phil Waldron going overseas to  
12 Italy and Serbia to get election information. I'm thinking she's in the inside. I want to  
13 help her out because she knows what's up.

14 I'd never met her before until after January 6th. Because I ran across her, she  
15 saw me, fine, but the first time I met her was months afterwards. And she alluded to  
16 the fact that she was somebody in the know and maybe a contractor, maybe in the CIA,  
17 but she was somebody's asset of somebody because she was running around getting  
18 election information.

19 Q Okay. We'll return to Rebecca Bennett, but just there to clarify, you  
20 mentioned her to me before, but you didn't meet her at either of the November or  
21 December rallies or in the January 6th events?

22 A From my understanding, I was even confused because she was beating  
23 around the bush and being really weird about how I knew her, she -- I should've known  
24 her or she was on the bus tour. I'm thinking, what the hell? I was on the bus tour.  
25 What the heck?

1                   So I come to find out she was on the bus tour December to the January leg of the  
2 bus tour, they did something after the December event, and she was a part of that.

3                   Q    In the lead-up to the January 6th?

4                   A    In the lead-up to January 6th.

5                   Q    Okay.

6                   A    And then I found out that she was, again, self-admittedly reporting to people  
7 like Jim Penrose, Sidney Powell, and Lin Wood's team. She threw out Mike Lindell. But  
8 she was the one going overseas to get those servers and that election information. And,  
9 personally, I think she stole it if she did get anything.

10                  Q    Okay. And then just going back to Charles Bowman quickly. You  
11 mentioned that he had some ties to -- I know you said Proud Boys, at least, and Oath  
12 Keepers. Can you describe to me how you learned that?

13                  A    Sorry. What was that?

14                  Q    Yeah. How did you learn that Charles Bowman had some sort of  
15 connection to the Proud Boys or Oath Keepers?

16                  A    He was alluding to things and having meetings where he'd have to put his  
17 cell phone in the microwave and have to talk off the record, and that he was showing us  
18 maps of like Google, the Capitol, and showing me perimeters and, you know, Proud Boys  
19 and people are going to be occupying this circle and, you know.

20                  So if this is Freedom Plaza, you know, he was showing me maps that we're going  
21 to have a layer of people this way, we're going to have a layer of people that way, so that  
22 way there's two layers protecting them. I'm like, where the fuck is this guy getting all  
23 this shit? But okay. Fine. Whatever. Cool. We're going to have more security?  
24 Is that what you're telling me? Cool. Awesome.

25                  Q    Okay. And that's on January 6th?

1           A    He showed me a diagram like that more along the lines of December and  
2   probably getting ready for the January 5th one.

3           Q    Okay. I'll just note for the record quickly that you drew that sort of  
4   double-layered diagram?

5           A    Yeah. It was just a map of Freedom Plaza, something with the Google  
6   showing me the perimeters that supposedly Oath Keepers, the Three Percenterers, the  
7   Guardians of Freedom or whoever these fringe militia groups were, they were going to be  
8   helping us with security.

9           Q    Okay. Any other specific groups you heard him discuss? You said Proud  
10 Boys. Did he specifically mention Oath Keepers to you?

11          A    You know, I think the word "Oath Keepers" was thrown around a lot.  
12 Principally, first, I think Ali Alexander had Oath Keepers as his security for the first  
13 November event, from what I've heard.

14          Again, I thought they was just goons, big lugs and just freaking looked like the  
15 bouncer-type of security guard you get in front of a club.

16          But I'd heard the name thrown around. I never even knew really who Oath  
17 Keepers truly was until after January 6th and Stewart Rhodes and who that -- who he was.

18          I didn't really -- maybe I heard the phrase or the word, but I just wasn't in tune  
19 and focused on that primarily, but it made sense to me afterwards.

20          Q    Did Charles Bowman ever mention any specific people that he talked to that  
21 were members of the Proud Boys or Oath Keepers?

22          A    No. I think he did a really good job purposefully in keeping things discreet,  
23 off the record. They trusted me to tell me a little bit, but didn't trust me enough to let  
24 me in the know. So I was okay being on the fence with that sort of thing, because really  
25 all I cared about was our events being done and conducted safely.

1           Like, listen, I don't care if, you know, I don't know who you are. I have no  
2 potential of vetting you. If I see you on the day of and you want to help and you want a  
3 secure perimeter and make sure people are being safe, sure, dude. Stand right there.  
4 Hey, no. Go over here for me instead. I need more people over here. Right?

5           I don't have any ability to vet people, but I'd make the best of anything that I have,  
6 just like I've pulled a bunch of volunteers and ransacked a U-Haul to get an event ready.

7           Q    Okay. And then let's just focus quickly on the specific plans for  
8 December 12th that you discussed with Charles Bowman.

9           He told you about this double security or double perimeter security plan that he  
10 had?

11           A    Yeah. I'll tell you, when we went to the December 12th meeting and we  
12 had a little pre-pow wow with security and we had that off the record, you know, "Oh, I'm  
13 going to show you maps of our security perimeter who Robert Lewis and Praetoria group  
14 provided to us, but you have to give it back to us," right, as if they're doing some  
15 hot-shot, fucking cool stuff. Screw you, man. Okay?

16           Half of us walked out of that room saying that was so stupid, all right? So their  
17 impression to be these high-tech security and information specialists monitoring the web  
18 for cyber threats and watching antifa's communications and back channels and all this  
19 cool stuff that they think that they are. I'm, like, "Oh, they're Michael Flynn's security  
20 guys. Maybe they have back doors and cool access to toys and they can reverse look up  
21 people's information by their phone number and all this stuff, and cool. Hooray.  
22 Awesome."

23           I don't know what the hell they're doing. They sold us that they were the good  
24 guys looking out for us, though.

25           Q    Do you recall who was at that security meeting for December 12th?

1           A    Oh, man, that was so funny because I looked back behind the wall and  
2    they're, like, oh, no, no, Jason.  Some people don't want to -- want to remain  
3    anonymous.  Like, what the fuck is that about?  You're our security team.  What do  
4    you mean?  I can't look at your face, bro?  That's weird.

5           Q    And you mean members of the --

6           A    Rob Lewises, like, whoever that they had brought in, whether Scott Chafians  
7    or Rob Lewises.  I was like, "Dude, what are you talking about?"  "Don't go, Jason.  
8    Some people" -- what?  Get out of here.

9           Q    So some group of people didn't want to --

10          A    Be identified.

11          Q    To be identified.

12          A    They didn't want to have their faces seen by me.  That's so crazy and odd.

13          Q    How about the people that you could identify, who was there at that  
14    meeting?

15          A    I mean, it was people, members of the bus tour with security, because they  
16    were giving us a meeting as people that were on the bus tour just arriving to D.C. to give  
17    us a briefing of what things were like on the ground.  Member of the organization,  
18    people managing VIPs, some of the VIPs potentially as well, right?  But it was a small  
19    group and it was letting us know that the security there had our back and that we were  
20    going to be okay, and look at all the cool stuff they did for us.

21          We're, like, oh, okay.  But ultimately it was just more of a show and, "Look, we  
22    got your back," but it was just people from the bus tour and the security team.  It was  
23    supposed to be a closed kind of private meeting.

24          Q    Okay.  And then -- so I understand for the December 12th event you were  
25    involved in a particular kind of argument between Flynn and Kylie Kremer and Women for

1 America First. Michael Flynn showing up at the SCOTUS stage and wanting to appear on  
2 the stage.

3 A Yeah.

4 Q Can you just describe that conflict for me?

5 A That was a really awkward situation that I was put in, because, similar to the  
6 November event, I went first to the Supreme Court to set up the event. Leave security  
7 personnel because somebody had to be by the stage, by the Supreme Court police rules,  
8 right? You can't just abandon the stage.

9 So by that time we knew better from the first time. So we had actual security,  
10 right, that was with the Praetorian group or Scott Chafian assigned a group to be there.  
11 Yet, it was really crazy and weird I had no idea, but Ali Alexander arranged through the  
12 Jericho March that Michael Flynn was supposed to go to the Supreme Court and speak  
13 there at like 10 a.m.

14 And I'm having a bunch of crowds of people starting to show up, couple tens, then  
15 couple hundreds. I'm, like, "Well, what the fuck is everybody doing over here?" "Oh,  
16 Michael Flynn is supposed to be speaking here." Speaking here? What? This  
17 is -- Dustin Stockton, all these people made sure to let me not let anybody use this stage  
18 because we thought Ali or somebody was going to come hijack it or Alex Jones or  
19 somebody, right?

20 "Jason, you can't let anybody speak on the stage. No, fuck that. I don't care if  
21 it's Michael Flynn, blah, blah, blah." Dustin Stockton barking up my ass, gave me a hard  
22 time. Come to find out, he comes in right after I leave and fucking let's Alex Jones and  
23 Flynn and all these people speak after he just told me not to let them speak.

24 "Oh, I was just trying to diffuse the situation." I'm like, "What? You just fucking  
25 ripped my ass off and chewed me out." First off, because I didn't want to -- and I

1 actually had to get on the stage and give everybody a message ad hoc. Because I said,  
2 "Hey, listen. Who here is for the Women for America First event?" And everybody  
3 raised their hand. "Who's here for the Jericho March?" Everybody raised their hand.

4 Well, the Jericho March -- and I said this to the public and on the microphone. I  
5 told them, hey, turn on the speakers. Well, everybody from the Jericho March let you  
6 guys down because they invited Michael Flynn and everybody to come here and they  
7 don't have a stage. What, is Michael Flynn going to come out here and bullhorn you  
8 guys? That's ridiculous. That's stupid. Whoever organized this event let you all  
9 down. And Michael Flynn was done a disservice by him being brought over here.

10 So I was arguing or kind of having discussions with, like, I think it was Alice  
11 Butler-Short, if I remember correctly, and this other gal saying that, "Oh, well, we have to  
12 have Michael Flynn and I'm all about prayer and we got to have Michael Flynn and, you  
13 know, God."

14 And I'm, like, "Well, dude, where's the Jericho March's stage? You guys just  
15 invited him out here to bullhorn? You know how stupid that is?" And Dustin Stockton  
16 is ripping my ass about not letting anybody stage. I don't care if it's fucking Michael  
17 Flynn. I was, like, "Oh, well, shit."

18 BY [REDACTED]

19 Q So just to clarify then, because I think I understand this right, but you tell me  
20 if I'm getting it right?

21 A Sure, yeah.

22 Q So Women for America First on December 12th is going to do the same  
23 thing that they -- essentially, the same thing they had done in November event with a  
24 stage and speakers at Freedom Plaza followed by a march to the Supreme Court where  
25 there's another stage. But, as you mentioned, at the Supreme Court, it's sort of first

1 come, first served. You can't get a permit. So you got to set up a stage and sort of  
2 squat there, for lack of a better term, right?

3 A Yeah.

4 Q So Women for America First's stage at the Supreme Court wasn't really going  
5 to be used until after the Freedom Plaza event. Unbeknownst to any of the Women for  
6 America First organizers, all of these people who had been told Jericho March speakers  
7 are going to come speak at the Supreme Court, they show up probably assuming, "Oh,  
8 this must be the stage."

9 A Yeah.

10 Q But that's sort of the -- that's the basis of the misunderstanding. And then  
11 there's the confrontation over whether allowing Jericho March people to even use that  
12 stage.

13 A And I'm a big boy. I can make my own decisions and I see the writing on  
14 the wall. And I told them, "Hey, listen, you guys are going to look like a bunch of  
15 assholes if you don't let him speak on your stage, cause where else is he going to speak.  
16 You're going to have us here sitting there?"

17 And so I actually took the Women for America First sign off the podium. I was,  
18 like, "Hey, guys, just put this over here for right now."

19 "Jason, leave. Get out of there. You're supposed to go to the Freedom Plaza."  
20 Dustin Stockton chewed my ass off.

21 Next thing I know I find out, like, the day after or whatever that he's fucking -- he's  
22 the one that came over there and became a hero and introduced them and fucking let  
23 them speak on the stage apparently. I was, like, what the fuck was that about?

24 Q Okay. That's helpful. I just wanted to clarify so that we understood that.

25 A Yeah. And that's what was weird and odd for me, is because I told

1 him -- and I told the crowd themselves too. Hey, listen. Anybody who organized this  
2 event let you guys down. They didn't have the event. Women for America First are  
3 using the stage and podium and speakers for the second half of our day's events.

4 So I kind of called them out and I told the security guys, "Hey, listen, I'm going to  
5 get the fuck out of here. Just keep it cool and I don't know what's happening, but I think  
6 Dustin or somebody is coming over here, but I was told not to let anybody speak on this  
7 stage." And I fucking ghosted. I just left. And I went towards the Freedom Plaza.

8 [REDACTED]. And at that point, who are those security guys that you're talking to?

9 Mr. Funes. Whoever was in black kind of appointed by Scott Chafian. It was  
10 like a handful, three or four guys that were there. We set up, like, a little baby  
11 perimeter.

12 Because of strict rules. I mean, yeah, you kind of have to squat there. Shitty  
13 saying it like that, but yes, because it's first come, first served.

14 So we set up the stage, put a little beta perimeter up, soft rope or something, and  
15 had security there, because that's the best we could do.

16 But the chaos on December 12th was Ali Alexander -- and I didn't really know all  
17 this stuff -- was creating other events and having things going on all the same day. So  
18 we probably had more people in Washington, D.C., for the December events, it was just  
19 spread out everywhere. So everything that the Women for America First and the  
20 Kremers were trying to do to build unity, fucking Ali just fucked it all up by splintering  
21 everybody off.

22 And, listen, we're not his daddy. We can't tell him what to do. But he was  
23 hell-bent on doing his own thing and taking credit for all the D.C. events, because if you  
24 still hear it talked about today, everybody said it's Stop the Steal events. Everybody says  
25 Stop the Steal, everybody got brainwashed into thinking all these events were Stop the

1 Steal events.

2 BY [REDACTED]:

3 Q And just to clarify on that, because I think you raise a good point that  
4 probably those of us who have been looking at this as intently as all of us have been  
5 understand, but there's probably some disconnect.

6 A Yeah. Oh, yeah.

7 Q There is sort of the phrase "Stop the Steal," which refers to, you know,  
8 concerns about the outcome of the election generally, like a catch phrase, but then  
9 there's actually like a formal capital "S" Stop the Steal organization that that's what Ali  
10 Alexander's sort of group is. Do I have that basically right?

11 A Yeah. I mean, listen, nobody owns the phrase "Stop the Steal." Come on.  
12 I mean, when it comes to election time or whatever, I mean, I'm sure people have been  
13 saying that since the sixties, right? Were they Ali Alexanders and Roger Stones with this  
14 great idea? No. Right? But Roger Stone admittedly created Stop the Steal and let Ali  
15 Alexander have it and to run it.

16 It was a cool hashtag. It was catchy. But Women for America First got  
17 drowned out by that scumbag who asserted, who has social media manipulation  
18 mastered. Okay? He is an IIA operator, the internet -- Interactive Internet Activities  
19 that our military uses overseas. He does that stuff, domestically.

20 He ran Mitt Romney's social media campaign after he was anti-Mitt Romney  
21 campaign back in 2012 or -- yeah, 2012. So this guy's got a hookup in the GOP. This  
22 guy's got hookups. He talks about billionaires. The Mercers gave him money. I don't  
23 know who else gives him money. But he's got access to all this money to do whatever  
24 the hell he wants and now he looks like some hero when nobody's even heard of him  
25 before.

1           Q     So just to clarify, though, when you say everyone now thinks that all the D.C.  
2     events were Stop the Steal events --

3           A     Yeah.

4           Q     -- what you're referring to is, there may have been a lot of events in support  
5     of President Trump following the November election raising varying issues about election  
6     fraud or even concerns that, in people's own words, the election was stolen.   But not all  
7     of those events were formal Stop the Steal, Ali Alexander's organization.   That's what  
8     you mean.

9           A     Correct.   And he did a fine job of asserting himself as the intellectual genius  
10    that came up with all of it.

11          Q     Got it.

12          A     He tried very hard to make sure that, "I created Stop the Steal.   I am doing  
13    something to support the President.   I have been doing this for 15 years and have  
14    worked over a hundred elections, and won them all.   I, I, I, me, me, me."

15          So everybody still thinks Stop the Steal is who did the events in D.C., including the  
16    6th.   He did a good job of brainwashing everybody, and he had help doing it.

17          BY [REDACTED] :

18          Q     Okay.   I just want to ask -- I just want to drill -- I know we've been focusing  
19    on security.   I just kind of want to understand who was associated with what groups.

20          So when you're at SCOTUS, you said you're with Scott Chafian's folks, a couple  
21    guys dressed up in Black.   Is that also 1AP?

22          A     I don't -- like I said, I don't know who Scott Chafian assigned and broke apart  
23    the security teams.   I don't know how large, how small.   We only saw the people in the  
24    room.   Some of those people didn't want to be seen.

25          Q     Okay.

1           A    I just kind of took it as, "Cool. Hey, I think I recognize you from the  
2   November event. Hey, cool. I'm Jason." They probably said their name. I forgot it.  
3   And I left them there because that was their assignment.

4           Q    And then when Michael Flynn arrived to the SCOTUS stage, was he  
5   accompanied by security?

6           A    I was gone by that point. I do not know. I'm sure --

7           Q    So you didn't interact with --

8           A    No. By the time Flynn actually got there, Dustin had scooped in and must  
9   have come in a few minutes after me. And he, I guess, had a little mini event there to  
10   himself.

11          Q    Then I just want to quickly look at another exhibit. If you want to flip to  
12   tab 3 in your binder. It's exhibit 3. And this is a text exchange, a short text exchange,  
13   between Kylie Kremer, Charles Bowman, and Dustin Stockton.

14          So for the first half of that page, they're just discussing Charles Bowman going to  
15   pick somebody up at the airport. If you look at the top half of the page, Charles  
16   Bowman texts the group, Dustin Stockton and Kylie Kremer, and says, "3/4 of Proud Boys  
17   are at monument now."

18          Do you recall Charles Bowman discussing any specific plan about coordinating  
19   with Proud Boys on that event?

20          A    I mean, this kind of proves what I was saying before.

21          Q    Right. That he had some sort of connection to the Proud Boys?

22          A    Yeah. I mean, he bragged about having to have conversations with people  
23   and put their phones in the microwave and everything's hush, hush and hush, hush, right?  
24   He had to have been talking to somebody.

25          Q    That sounds like a specific memory you have of a conversation with Charles

1 Bowman about putting his cell phone in a microwave. What was that conversation?

2 A About security and adding an extra layer on top of Scott's team, that they're  
3 going to go, you know, work with other patriot groups and they're going to set up a  
4 perimeter. And, you know, those are the guys that really keeping us safe. It's not  
5 these guys. It's everybody else. Proud Boy's good.

6 [REDACTED]. What does that mean, to put your phone in a microwave?

7 Mr. Funes. Listen, I think we live in a day and age where people are paranoid  
8 because of everything is recorded. I mean, you have third-party vendors that work for  
9 Apple that said they're listening to people having sex and their private conversations get  
10 turned on by Siri, and they just have open access and free-for-all to that information.

11 So people have concerns, whether it's legit or not or, you know, I don't think  
12 everybody thinks there's snipers on the roof, but I think when your people are having  
13 conversations that they want off the record, same reason you guys or anybody else would  
14 use a SCIF. You put your phone away. You don't know who's on it.

15 [REDACTED]. Yeah, I'm just -- I don't want to betray too much of my ignorance on  
16 this, I just am curious that it's not we're going to go and, like, zap our phones in the  
17 microwave; it's just, we're going to have a conversation, so everybody put your phone in  
18 the microwave because the idea is that, whatever signals won't transmit if it's just sitting  
19 in a microwave while we have our private conversation.

20 Mr. Funes. If you put your cell phone in a microwave, you will lose service, it will  
21 not be connected to your cellular devices, and, it is, therefore, cut off from the outside  
22 worlds because of the essence of how a microwave is designed.

23 BY [REDACTED]:

24 Q Okay. I just also wanted to go look at that text right above, the "3/4 of  
25 Proud Boys are at the monument now." It says -- the next text he sends is, "So antifa is

1 going to" -- "So if antifa is going to come and try to break the box it will be now."

2 Is the box that diagram that you were just describing?

3 A There we go. He's talking about what I was talking about, right? So,  
4 however, which way it was, they set up perimeters and squared units around the  
5 Freedom Plaza.

6 Q Did you ever hear Kylie talk about her impression of Charles Bowman or  
7 what she thought of these plans with the Proud Boys?

8 A Amy would have been wiser and alienated us and everybody from working  
9 or interacting with Proud Boys. I think Kylie is just a little bit more young and ambitious  
10 and, you know, "We're just keeping people safe, right?"

11 Okay. Well, I don't like them, but with Cindy Chafian in her ear telling the  
12 constant threats of antifa trying to break up our event and planting these seeds of  
13 distrust and chaos potentially happening, and she's working with Scott Chafian, and that's  
14 the aboveboard security.

15 But if you add an extra layer of some groups and some people are just going not  
16 sit there and beat people up, but are just going to stand there and just make sure  
17 knuckleheads aren't trying to get through, you know, at the moment, like, I didn't ask  
18 questions. I don't know if she asked questions.

19 But, hey, listen. He seemed like somebody that was trustworthy and honorable.  
20 I don't believe that's the case any longer. But at the time.

21 And so, sure, you want to put your microwave -- your phone in the microwave and  
22 talk to Oath Keepers, the leadership of militia groups, and set an extra perimeter up,  
23 dude, go do your thing and I don't want to fucking know the details.

1

2 [1:15 p.m.]

3 BY [REDACTED] :

4 Q Okay.

5 And then, also, just returning -- if you go to tab 4, this is exhibit 4. These are  
6 some texts between you -- it's that same group text -- Kylie Kremer, Amy. And then  
7 Dustin and Cindy Chafian -- Dustin Stockton and Cindy Chafian are also on this group text.

8 And this is around the time of the issue with Michael Flynn. And Kylie's directing  
9 you to not let Flynn speak on the main stage -- or to speak on the stage because he'll be  
10 on the main stage later. And then she says, if you look at this first page, "PEOPLE ARE  
11 TRYING TO SABOTAGE US."

12 A Um --

13 Q It's that top text in blue. That's Kylie Kremer.

14 A Yeah. Okay.

15 Q And you can take a second to look at the surrounding --

16 A Yeah, I kind of -- this is, again, when I was asking -- I haven't gone through  
17 this completely yet, so just kind of from memory, just telling you straight up. Like, we  
18 had a problem. I was trying to reach out and figure out how to find a resolution. How  
19 do I deconflict this mess and make you guys not look like idiots?

20 Q Yeah. So I think I understand most of that conflict. And what I'm asking  
21 here is, when she says, "PEOPLE ARE TRYING TO SABOTAGE US," do you think she's  
22 talking about Ali Alexander and folks associated with the Jericho March? Or is that  
23 Cindy Chafian? You had --

24 A No, I think the -- listen, there was still trust with Cindy Chafian up until that  
25 point. She didn't go batshit crazy until after December, December's event.

1                   Ali Alexander is putting pressure -- and he had organized an event, through the  
2                   Jericho March, to invite Michael Flynn to the Supreme Court, and we had an event there.  
3                   I don't know if he knew we had the stage there or not.  Was that planned behind the  
4                   scenes and made to look like a chaotic event when they really knew what was happening?  
5                   I'm more inclined to think that today than I was back then.

6                   But back then, like I was telling you guys:  Yo, Amy, Kylie, you guys are gonna  
7                   look like idiots if you have your stage up here and I got it with "Women for America First"  
8                   and Michael Flynn's on the side bullhorning.  People in the crowd are going to think,  
9                   "Those people are assholes.  Those girls are bitches.  Why didn't they let him speak?"  
10                  Right?  I was like, dude, you guys have a problem.  Do you know how bad it's gonna  
11                  look?  Right?

12                  So I was trying to reach out, and no, no, no.  And I'm fucking thinking, "Whoa.  I  
13                  thought Michael Flynn was our boy.  This looks bad.  I'm gonna get the fuck out of  
14                  here."  I addressed the crowd, and I told them, like, Jericho March let you guys down.  
15                  And I got down.  I grabbed the podium off the mic -- their sign off the podium.  I put it  
16                  on the side.  I was like, "Yo, guys, I'm gonna go" and walked away.  Because I didn't  
17                  want that signature of Women for America First being there when they're telling me to be  
18                  basically a dick and not let them speak on it.

19                  Q     Understood.  Okay.

20                  A     And I motioned and -- you got that.

21                  Q     Yeah.

22                  [REDACTED].  Yeah.  We can say for the record that you got up and sort of  
23                  pantomimed what you did by removing the sign from the podium and setting it to the  
24                  side before --

25                  Mr. Funes.  Yeah.

1 [REDACTED] -- you left the location.

2 BY [REDACTED]:

3 Q I think we kind of understand the December 12th event. Just one other  
4 question that I've seen in the documents.

5 There was at some point a group text that you were on that you named the Black  
6 Robe Regiment.

7 A Uh-huh.

8 Q Just trying to understand the groups that were involved in this. What was  
9 the Black Robe Regiment?

10 A Pastors are gullible and stupid. I love them, but they don't know politics.  
11 But they use any platform they can to try to get their message out, for better or worse.

12 Q So this was --

13 A So the Black Coat Regiment was Pastor Brian Gibson's idea with John  
14 Locke -- or, not John Locke -- Pastor -- yeah, Pastor John Locke.

15 [REDACTED] Greg Locke?

16 Mr. Funes. Greg Locke. John Locke's the philosopher our Constitution's based  
17 off. Yeah.

18 So Greg Locke had come up -- I think Pastor Brian was probably a little bit more  
19 the spearhead, but they kind of joined, melded minds together, you know, bringing back  
20 our Revolutionary War days, where pastors and church leaders were the ones helping  
21 recruit for the Continental Army against the British.

22 So there's a longstanding history regarding the men of cloth being the people -- or  
23 being the leadership to tell the people there's a time for peace and a time for war. So,  
24 during the Revolutionary War, it was the pastors that were bringing a lot of the local  
25 community to sign up to fight the British and the Continental Army.

1           So I thought it was a cool, neat part of history. I thought it was kind of neat that  
2    they'd be out there and have the balls to say some stuff like that. A little risque? I  
3    mean, I don't know. They weren't doing it or using it in a risque fashion, but, I mean, I  
4    think that's -- they were just, again, trying to get the message of the Lord out to the  
5    people.

6           And, you know, there's a strong portion of our Trump-supporting community and  
7    the MAGA movement that are extremely faith-based Christians, right? And so it was my  
8    idea to -- I was the one that reached out to them on behalf of Dustin Stockton and got  
9    these people on board. I was the one that got them involved to begin with. And I had  
10   to win them over, just for Dustin Stockton to just go ahead and become best  
11   friends -- and I don't care. I don't want anything from these people.

12           But I thought it was very, "You scratch my back, I'll scratch yours. I'll do  
13    whatever it takes. All I need is a platform. And I don't care about the inner drama and  
14    politics. I'm just here to get my message out." Well, that's all stupid, because look  
15    what fucking happened on January 6th and look at the people you helped validate by  
16    doing so. Thanks, Pastor Brian.

17           [REDACTED]. Let's -- unless you have any more --

18           [REDACTED]. Yeah.

19           [REDACTED]. -- questions on December 12th?

20           BY [REDACTED]:

21           Q    Before we move on from those earlier rallies, I want to ask you: You  
22    mentioned, I think, what I understand to be called from a security perspective "access  
23    control," that one of the primary jobs for security at Freedom Plaza was access control to,  
24    sort of --

25           A    Hmm. I'm glad you bring that up.

1           Q    -- VIP, backstage area.  And that was, I think, a primary role.

2           It sounds like there also was this role, mentioned by Charles Bowman in  
3           conversations and also in the text messages, about creating sort of a perimeter.

4           My question for you, Jason, is:  Do you recall during those events -- because I  
5           think we all know that it's been publicly reported that in the evening of December 12th  
6           and November 14th, there were skirmishes and scuffles and some altercations between  
7           people, but that's not during the events.

8           A    Yeah.

9           Q    During the events at Freedom Plaza, do you recall any, for lack of a better  
10          term, security incidents at Freedom Plaza that required security to step in and do more  
11          than just kind of be physically present?

12          A    You know, I think the -- let me start with this.  In November, we had very  
13          little incidences, especially during the event.

14          Q    Uh-huh.

15          A    The skirmishes that evening were very focused on people in black -- and I  
16          was staying at the Willard Hotel -- that were dumb enough and acting like Neanderthals  
17          and like "Space Odyssey 2001," like, beating their chests and just screaming at the sky  
18          because somebody had a Trump flag hanging from the window, and they were literally  
19          shooting bottle rockets and fireworks at it.  And they're like, "Rawr, argh, rawr," like  
20          frickin' -- they looked like a bunch of idiots, all dressed in black, all blacked out, all black  
21          gear.  And I had my Trump campaign jacket on, and I gave two shits about them.  I'm  
22          not going to be intimidated in my own country by domestic terrorists.

23          But I was curious as hell, so I went back there behind the Willard that night.  And  
24          I even told the people at the Willard downstairs that there's a whole access-way, that the  
25          police blocked off this, but if they go up one block and go to the Treasury building, they

1 can come up very easily right in front of the Willard. So, "Hey, guys, there's Antifa over  
2 here." People were like, "Oh, my gosh." Like, "It's cool. It's all right. Just heads up.  
3 I just got back from walking over there. There's an alleyway the cops let open, and  
4 there's potential they could be down here." Right?

5 Some people left. But I was just trying to give them the courtesy because I saw  
6 shit happening, right? I come to find out and see it on FOX News the next day that that  
7 place got assaulted, ransacked, and fireworks were being shot up in that same downstairs  
8 where I just warned people before.

9 So Proud Boys probably -- no. I know Proud Boys ratcheted up the animosity and  
10 the conflict. And it was much more evident in December's event than it was in  
11 November's. The November event, I probably had one or two, like, Antifa somebody,  
12 "Fuck Trump," blah, blah, blah, coming in. Hey, we need to get that guy out of here,  
13 because I know how a problem starts: with one person. So we removed him. One or  
14 two, that's it. Right?

15 And even our own crowd of people, "Hey, this guy is Antifa," blah, blah, blah.  
16 Like, even fake -- the American flag Trump hats. Like, I even kicked out a guy wearing  
17 that that was talking shit about Trump. I'm like, "Dude, just because you wear the hat  
18 doesn't mean you're Trump, bro. Get the fuck out of here," right?

19 December 12th, a little bit more, right? And so that's when I think I pretty much  
20 recall Proud Boys circling Freedom Plaza: "Fuck Antifa." [Witness claps.] "Fuck  
21 Antifa." And so there was probably more incidences during the day from both sides  
22 than there was the one-sidedness that happened post-the-November-event, right?  
23 And, looking back, they were at fault for helping antagonize and create the situation.

24 Q When you say "they," who do you mean?

25 A Proud Boys.

1                   Q     Okay.

2                   A     But guess what. The Metro Police Department here sucks, and they're  
3     fucking assholes. And they just let shit get out of hand before stopping it and would just  
4     stand by. "Oh, we're not here to do anything. We're just here to support and keep an  
5     eye on things." So it's okay to get fist fights that happen in front of you and you not do  
6     anything, but the second that a MAGA supporter or something wants to defend  
7     themselves, they're quick to fucking run up on them? That's bullshit.

8                   The Metro Police Department let things get out of hand both in November and  
9     December.

10                  Case in point: I was outside in November at the Willard Hotel. And there's this  
11     black girl with the weave, "Agghh," probably demon-infested, some crazy -- she was off it.  
12     She was on drugs or something. "Eeghhh, aaghhh." Like, with a video camera, a guy  
13     with a 4K TV, like, a heavyset camera, like Antifa's -- some of the leftists at these riots  
14     have the best camera equipment, okay?

15                  And there's one guy just watching this one girl get in people's faces. "Agh, fuck  
16     Trump. You guys are assholes. You're all racist. Aaghhh." And the fucking cops are  
17     just sitting there watching one person in this whole block between JW Marriott and the  
18     Willard Hotel -- it's blocked off with police. Yet they're allowing one person, just  
19     allowing her to get in people's face, wave her weave around.

20                  And I'm telling people, "Stop giving her the attention. Put your cameras away.  
21     Go hang out with your family. Go do other shit. Don't give her attention." And she  
22     was in everybody's faces, getting in front of them.

23                  "Sir, please, excuse me. Can you remove her? Can't you see she's a problem?  
24     Do you want this to escalate into something bigger?" He wouldn't do anything. The  
25     whole police force would just sit there.

1           I go up to the chick, and I'm trying to talk her down, like, "Hey, you know, we're  
2 just trying to do our own thing," like -- you know. "Eghh, what's your name?" And I  
3 fucking have a conversation with her.

4           Next thing you know, I'm talking to the police, trying to get them to remove this  
5 gal, and I hear somebody zapping with a taser. Now, a zap is self-defense. When you  
6 have a taser and you're chasing after somebody, you fucked up. That's a weapon, right?  
7 And that was our people trying to defend themselves from that girl's weave, putting her  
8 face in everybody.

9           I'm like -- [Witness gasps.] And I sprinted towards her. And guess what. The  
10 police came right behind me. Finally, they'd stopped something. It was a MAGA  
11 Trump supporter and not, like, this crazy wacko that's got a videographer just hovering,  
12 waiting for batshit to happen and get it on video, right?

13           And so she was totally in the wrong, trying to chase down somebody, that same  
14 lady, with a taser, and the whole squad unit came and scooped her up right in front of  
15 me. I said, "Please, don't resist," because she was kind of fighting. And then she let  
16 herself go, and they literally picked her up off the ground and let her down like a pillow,  
17 when I told her to stop resisting.

18           The Capitol Police Department here fucking suck. And they allowed for things to  
19 happen and waited for a situation to be exacerbated. So, instead of preventing chaos,  
20 they were just as bad and culpable as anybody for allowing it to happen. And I was  
21 pissed at seeing that firsthand.

22           BY [REDACTED] :

23           Q    I want to ask a little bit about that issue, kind of, exacerbation or -- and focus  
24 on what happened on December 12th.

25           So the Proud Boys made the perimeter around Freedom Plaza, and you saw some

1 of that. Did you ever have any conversations with Charles Bowman or anybody else  
2 about the Proud Boys' presence in December?

3 A I talked to Enrique Tarrio after the November rally, and I said, you guys got a  
4 fucking problem. I think it's -- to me, at first, I thought it was a PR problem. You guys  
5 are being notorious for being out there bashing heads. Listen, patriots don't have to do  
6 that stupid shit, okay?

7 I understand where you guys are coming from. There was a point in time in '16  
8 and '17 where people were getting drinks poured in their faces at fast food restaurants,  
9 punched in the face just for wearing a MAGA hat. Shit, recently there was a white  
10 woman that said "White lives matter" to a group of Black Lives Matter group, and she got  
11 shot and killed for it.

12 So, at some point in time, I'm working in the administration. I'm not out on the  
13 streets. I'm doing my job. I'm not out here to politically antagonize anything. But  
14 I'm like, oh, well, at least somebody is sticking up for MAGA supporters, because I know  
15 what the cops do. They just sit there and watch shit go down.

16 So, listen, I'm tired of people getting bullied around. Conceptually, "Hey,  
17 somebody's defending us." In practice, they're part of the problem, right?

18 And I spoke to Enrique Tarrio, telling him this. And I was like, "Dude, you guys  
19 need to chill out. Like, let me help you guys. Let me talk to you, let me try to talk to  
20 some of your people. Like, you guys need to fucking tone this shit down. It's getting  
21 too much." And that was before the December rally.

22 Q So it was apparent to you --

23 A And at that point -- and at that point in time I was standing right next to him  
24 at the JW Marriott, I had never even had a real conversation with him. I really barely  
25 even recognized him. I didn't really -- I've heard the name but never even really knew

1 what Enrique Tarrio would've looked like.

2 As a matter of fact, I was drinking, chilling a beer -- drinking a beer with this guy  
3 named Noble Beard, his number-two, when they were both at the JW Marriott. I think  
4 he's cool; he's all right. Enrique was standing right next to him the entire time. I didn't  
5 really know. But, apparently, the first time I really actually talked to him is because  
6 somebody connected us.

7 And I said, "Enrique, you've got a fucking problem. Your group is getting out of  
8 hand."

9 Q And that's --

10 A "And it's making the President look bad," is my big point that I was making to  
11 him. "You're making everybody look bad."

12 Q So it was apparent to you after November that there was some problem  
13 with Proud Boys being involved in escalation. How did you communicate with Tarrio  
14 after that November --

15 A You know what? I kind of forgot about that. I'm glad you mentioned it.

16 I didn't. I tried to connect with him. I don't have time. I'm not here to  
17 babysit you. I'm trying to do you a favor. Fuck you. You don't want to reciprocate.  
18 You don't want to have a conversation. You want to let your fucking people go be all  
19 crazy. Fine. Fuck you. I don't have the time to waste on you to try to convince you  
20 otherwise.

21 Q And then, for the December event, did you ever have any other  
22 conversations with Charles Bowman about, kind of, the Proud Boys' activity in December?

23 A Like I said, it was more along the lines of the boxes and him insinuating the  
24 fact that he was talking to some -- you know, Bowman was in communications with  
25 leadership or somebody with the militia-type groups, Oath Keepers, Proud Boys. He

1        might have mentioned a couple of them. I know he mentioned Guardians of Freedom a  
2        lot and Three Percenters.

3            Q    I mean after the rally. So, beforehand, he's telling you about the perimeter  
4        and the boxes and what Proud Boys are gonna do. I mean after, maybe on the 13th or  
5        14th or whenever it was.

6            A    So, in security, in anything, like, any grownup and professional, you have  
7        after-action reports, right? You go find out what you guys did, you did something, and  
8        you talk about how you can do it better, improve upon it, what we did right, what we did  
9        wrong, so we can grow and become a stronger unit, right?

10           Q    It was so weird. It's like those people, they didn't want to talk about anything.  
11           It struck me odd. After the 2 weeks of the bus tour leading up to December, I was out.  
12           I told them to fuck off ahead of time. "Listen, I'm done. I did advance. I helped you  
13        guys out. I'll see you guys in January. If you want my help, I'll be here. But I'm not  
14        doing this fucking bus tour shit. I'm done. Fuck you guys."

15           Q    Okay. That actually brings me to, sort of, the next thing I want to discuss,  
16        which was after December 12th.

17           So you just said, at the end of the bus tour, the December 12th event happened,  
18        and then you, you know, kind of left the scene until you said you'd see them in January.

19           A    Like, I said that kind of open-ended. You know, "Please, I do want to help.  
20        I didn't get here to drop the ball and not see this through to the end." It was me being  
21        assertive and saying, "Hey, I don't like how things are operating. I don't like being kept  
22        out of the loop. I don't deserve to be treated like a fucking child and on the sideline,  
23        only to try to catch up and clean up you guys' mess. I'm done. I can't do this. I don't  
24        know what the fuck's going on. I'm out."

25           Q    So I guess my question is just, after the December 12th event, when did it

1 become clear to you that January 6th was going to be the next event?

2 A Oh. Well, I knew it from the beginning. It was already -- the writing was  
3 on the wall after December. What's next? Oh, January 6th. Oh, really? Well,  
4 fucking let's see the shitshow that happens after -- between, you know, Christmas, New  
5 Year's, and January 6th.

6 Because that's when Cindy Chafian started breaking bad and started thinking that  
7 she was higher than holy and that she was super-special and she was in charge of the  
8 January 6th event.

9 Q When did you learn or how did you learn that January 6th was an important  
10 date? Do you remember that?

11 A Probably just gearing up to December 12th. Like, I don't have time to  
12 worry about that. I had no interest in really being too much a part of that at that point  
13 in time. So I was just trying to see the mission done for December 12th, and I wasn't  
14 really asking details.

15 But I knew it was apparent that, you know, January 6th was a date. Probably  
16 along the bus tour or something. Because nobody really pays attention to that  
17 January 6th kind of more procedural process about the electoral college and the  
18 certification of votes, right? That happens year after year after year, but nobody really  
19 pays attention or is talking about it. It sounded like they were gonna be doing  
20 something for January 6th and for that. Right?

21 At some point in time between the November and December rally and the bus  
22 tour probably, I found out, okay, they're going to be doing something after the fact.  
23 Like, so December 12th isn't the culmination of all this; there's something going on  
24 post- that.

25 Q Okay. Was there some time after December 12th that the importance of

1       January 6th was made clear to you?

2           A    I mean, it'd be the same answer I gave you before. I mean, I didn't, myself,  
3   realize about the procedural process and more of the formality that happens on  
4   January 6th. I've heard and kind of known that that happens, but it just wasn't really  
5   something that was widely apparent probably to, you know, 9/10ths of Americans, to be  
6   honest with you, until, you know, this year -- until that year, 2020 or '21. Yeah.

7           Q    Okay.

8           I guess I'll be more specific. What I'm trying to understand is -- I get that during  
9   the bus tours and leading up to December 12th you understood January 6th was a day  
10   and there might be some events on that day.

11          A    Yeah.

12          Q    When did you realize, "Oh, this is a big event"?

13          A    When I saw the crowd, and I was -- in December, and that we kind of put the  
14   genie back in the bottle or put lightning back in the bottle. We had just as -- we were  
15   pretty much similar -- not quite. It wasn't as beautiful and as organic as the first one,  
16   but we had momentum.

17           Like, this was something that was happening. There was lawsuits being filed.  
18   There was challenges to the election happening behind the scenes. I was too busy  
19   working to pay attention to what was in front of me. I wasn't watching the news. But  
20   you know what? Like, it was a big deal. It was gonna be a big deal.

21           And you know what? Women for America First wanted to see this through.  
22   You know, I didn't really know that they were already pulling permits or discussing  
23   permits and all that. Good for them. Right? But I knew it was gonna be a big day  
24   because of the significance of challenging votes for the electoral college of the States -- or  
25   certifying the States. Right?

1                   So I knew that that was going to be a big event. And I knew that there was going  
2 to be competition on who was going to be in charge and who was going to take credit -- if  
3 the President did get involved, who was going to try to take credit for it. Because I knew  
4 if there was anybody that actually was a real human being and actually who they say they  
5 are and have a longstanding career that's public and people know who you are, the  
6 Kremers probably had more of a chance in relationship to try to get the President to  
7 speak to the crowd. Not fucking Ali Alexander. Right?

8                   So I knew that there was already problems with who was going to be in charge of  
9 the event. Once I heard rumors after December that Cindy Chafian kind of broke away,  
10 and the rumors were -- because I was in constant communication with people like Matt  
11 Couch. And he was the one working with Cindy Chafian on the underbelly of things.  
12 Because the mantra was, well, fuck the Kremers. Right? So, if Matt Couch saw an  
13 opportunity to emcee and be Cindy Chafian's guy to help her organize the  
14 events -- because apparently he had some hot hand or he was fucking popular at the  
15 time. Screw that guy. He's fake.

16                   But Cindy Chafian had the idea that Matt Couch was going to help her hijack these  
17 events and put on the similar or same events; it was just going to be her in charge of  
18 them.

19                   BY [REDACTED]:

20                   Q Let me ask you, since you're -- you're on this bus tour between the  
21 November and December rallies, correct?

22                   A     Between when?

23                   Q     You're on the bus tour between November and December?

24                   A     Yeah. November-December, yes. Yeah.

25                   Q     And it's a bus; there are some, I think, rented cars. Is that --

1           A    Yeah. I mean, it was a big production. We ended up getting a second  
2 bus. You know, Trump had a rally in Georgia --

3           Q    Right.

4           A    -- and Women for America First was basically hoodwinked into thinking that  
5 they were going to be more part of the event in Georgia. But guess who was in charge  
6 of that event. The GOP was paying the bill.

7                   So whoever pays the bill for the event, not Trump for President,  
8 Incorporated -- from my understanding, from the way I saw the people and who was in  
9 charge, right? From my understanding, maybe I'm wrong, but it seemed like more GOP  
10 State officials and people were in charge of calling shots than Trump campaign officials.

11                  So, when it came to us arriving there with a frickin' second bus that probably cost  
12 them \$250,000-plus because they got promised to go to and be part of the event stage  
13 and build-up of the stage, they wouldn't have frickin' got a bus if they weren't assured  
14 that and invested that much money.

15           Q    So let me ask you, while you're on the bus, are you -- or on this tour, are you,  
16 personally, reaching out to contacts you have from the Trump campaign or the White  
17 House about the bus tour?

18           A    I tried very hard to let them deal with that shit.

19           Q    "Them" meaning?

20           A    The Women for America First organizers, anybody else --

21           Q    Okay. So --

22           A    -- right? I had just gotten done working with them. I knew this was  
23 something that was grassroots. They weren't endorsing this. They weren't, like,  
24 hanging their hat and saying, yeah, this is what you're gonna do. So I didn't want to  
25 muddy the waters.

1           If I had contact with anybody, maybe to ask or do -- just trying to get my intel,  
2 especially when frickin' stuff about January 6th was breaking out and Cindy was trying to  
3 steal the permits. I was in California trying to figure out -- and kind of laughing at that  
4 point. I was like, "Man, I knew this shit was going to happen." Right?

5           Because this is all the stuff that happens behind the scenes. People show up,  
6 rah, rah, rah, but they don't know the drama, right? Especially if the President was  
7 involved with speaking. That's a big deal.

8           And that was always the question, is he gonna be a part of this, is he not, like, for  
9 the other events too. I mean, everybody -- "Oh, is Trump gonna speak?" I mean, you  
10 can go to an event and wave some flags on the corner of the street, and they'll be like,  
11 "Oh, is Trump coming?", you know, if you've got a bus or something. Right? No,  
12 Trump's not in the bus. Right? Obviously.

13           Q    So --

14           A    But people had that expectation, and people knew that if he was going to  
15 come and speak at any of the events, it had to have been probably the 6th.

16           Q    Okay.

17           So my question, then, is, were you aware of any contacts between the Kremers  
18 and the White House or the Trump campaign while on the bus tour?

19           A    I try to keep myself ignorant. I don't know specifics and I don't  
20 know -- you'd have to ask them. Because was there a situation where there was  
21 contacts and -- let me put it to you this way: After November 3rd's election, who wasn't  
22 trying to get a hold of Trump and the staff, administration? Right? Let's just set the  
23 bar for where it is. Right? Organization planning, communication with the White  
24 House --

25           Q    So my question is actually pretty direct, which is, are you aware of? Not,

1 did you try to find out or --

2 A Oh. Yeah, I mean --

3 Q I'm just asking, were you aware of contacts with the White House?

4 A Listen, the most I knew is that, at the end of it, I think Amy got invited to the  
5 White House Christmas party or something like that, right, that she went to. And aside  
6 from that, no --

7 Q Did you --

8 A -- I'm not aware of any communications directly with the President, White  
9 House, administration, or campaign.

10 Q So you never heard Kylie, for example, or Amy talk about contacts with Mark  
11 Meadows?

12 A I can't recall. I don't believe so. I do know that they had a relationship or  
13 friendship -- and this is kind of, not public, but kind of, like -- you know, they knew Katrina  
14 Pierson, right?

15 I don't know, aside from that, where things go. Honestly, I don't fucking want to  
16 know. Because I've worked in the administration, I've worked on the campaign, and  
17 you're supposed to keep a line between stuff, right? I know when you're a GS or SES  
18 you have a little bit more latitude and things like that. You're -- the Hatch Act and ethics  
19 people are the experts. And whether they actually put the teeth on anything or not,  
20 who knows.

21 Under Trump, everything was getting attacked, right? So, to be honest with you,  
22 I kept myself unaware, because I don't want to be the guy that muddied waters, and I  
23 don't want to be in the middle of anything, like, controversial, other than the fact that I  
24 just want to see these events be great, be magnificent, be safe.

25 I also believe that the election was robbed, especially at the time, that there was

1       questionable activities. Let me say this: I know for sure, for a fact, there's  
2       questionable activities that happened on that election. So I wanted to make sure I did  
3       my part. And I didn't want to know.

4           Q     So I understand you didn't want to know. And you've given lots of  
5       explanations for why it would've made sense for you to not try to find this information  
6       out --

7           A     You're trying to pin me down, but I'm just not ready to take --

8           Q     I'm not trying to pin you down. I'm trying to move more specifically to the  
9       moment -- if you know -- where, sort of, the stars align and Trump is publicizing an event  
10      for January 6th and Women for America First is now planning an event for January 6th.

11       So do you know how that came to be --

12       A     I don't.

13       Q     -- that it happened, sort of --

14       A     Yeah, I --

15       Q     -- in the same day?

16       A     I don't. When Trump retweeted or said something about any of the events,  
17      I probably saw it, like, a couple days or a week after he sent it, because I wasn't on social  
18      media, I wasn't fishing for it, I wasn't trying to find out who was doing what. I kind of  
19      found stuff out as the public did. And it wasn't even real-time. Because I was kind of  
20      occupied by calling ahead, doing what I was doing for the bus tour and that sort of thing.

21       And so I don't have any recollection or don't know of any specificity or any  
22      communications that they were having with the White House or Trump or Trump  
23      officials.

24       Q     Was there any kind of falling-out between you and Kylie or Amy in December  
25      of 2020?

1           A    Yeah.  And I think there's going to be an incident that's going to be  
2 highlighted by scumbags like Ali and everybody else specifically because -- listen, I just  
3 didn't want to be on the bus tour in that situation and stuff anymore.  Right?

4           And there was some controversy about my Women for America First jacket.  
5        Okay?  And Kylie wanted to be, you know, overly righteous and this, that, or whatever  
6 and try to make a big scene and drama.  Who knows what she was thinking or what was  
7 in her head, and how it was so important that I didn't have my Women for America First  
8 jacket anymore.  I was, like, "All right, fuck you.  Have it.  Take it."

9           Q    I don't want to be indelicate, but we've talked to a lot of people who've  
10 come and gone from the bus tour.  Does any of that have to do with a personal  
11 relationship issue with Kylie Kremer?

12          A    So this is where things are personal and -- so we haven't had any type of  
13 relationship, right?  And you're prying into something private, but it's been made public,  
14 and this is an issue of discussion.  Because the rumor was that Ali said that I was banging  
15 out Kylie Kremer and doing a bunch of coke on the bus tour.  Supposedly, some rumors  
16 are spinning around that that was happening.

17          What the hell kind of bullshit talk is that?  Especially with Mike Lindell sponsoring  
18 and being a -- recovering from, you know, addiction and being the strong Christian that  
19 he is.  Like, I thought that was fucking uncalled for.

20          And so who knows what was going on, but the rumor was -- that afterwards I find  
21 out that that rumor was being spread, which I thought was absolutely fucking ridiculous.

22          So whatever happened that night, an incident, or for whatever reasons it was, I  
23 already told you, I was out.  By December 12th, I was letting them know, I'm done.  If  
24 they wanted to try to give me a hard time and she was having an emotional crisis and  
25 stressing out about some other shit and she wanted to be petty about some stupid shit,

1 fine. I'm above that. I don't care, right? Because I'm done.

2 So whatever happened that day, listen, I got no animosity. Okay? At the end of  
3 the day, I respect and I love Amy. I think Kylie got taken advantage of and was being  
4 pulled in a lot of different ways. I don't know where her head was at. She was  
5 getting -- the stress was getting probably the best of them. That's why I was leaving, I  
6 was out, I was done with the bus tour.

7 And I told Amy, I was like, listen, I'll be more than happy to help, right, with  
8 January 6th, but I'm just -- you're not paying me. I'm not here to make my life this  
9 complicated. Done.

10 Q Got it. And I appreciate that. I was -- when I said -- I was really fine with  
11 just calling it "personal relationship issues" and not get into the details --

12 A Yeah, but you've heard what other people have said.

13 Q I just wanted to make sure that I understood how, from your own  
14 perspective, if at all, that stuff affected your decision to leave. And I think it's clear. So  
15 we don't have to go over it.

16 A And I was pissed that they would try to say some stupid shit about me like  
17 that, all right? Hey, I might smoke some pot, but fucking doing cocaine and doing some  
18 stupid shit like that on the bus tour? Are you fucking kidding me? That's ridiculous.  
19 Okay? People are fucking absolutely out to get me, or get you, or get anybody, if that's  
20 the type of shit they want to spread around.

21 That fucked me up. And I didn't realize that that was happening. Ali had  
22 mentioned some stuff to me indirectly and kind of directly, admitting the fact that he was  
23 gonna start some rumor about that. "Oh, weren't you banging out Kylie and doing blow  
24 on the bus?" What? Fuck you. Like, that's fucking offensive, especially in the time  
25 and the moment and place. I had just left a career in politics. I was trying to join the

1 Army.

2               Okay, don't take one thing and make your own convenient story into something  
3 else just to defame somebody and have him look like the crazy guy on the outs.  
4 Because that's some fucked-up shit to say. That's like saying, "Hey, do you like raping  
5 kids?", or, "That's the guy that was raping kids." Like, what? How do you say -- you'll  
6 always have some reputation out there from somebody saying some stupid shit like that.

7               Especially in the time of crisis that we were in and around in that time, for  
8 somebody to start a rumor like that? Fuck you. Whatever happened between Kylie  
9 and I is none of anybody else's business. It became a scene, and it became public for  
10 one incident, and it was done. I didn't give a shit. I don't hold grudges like that.

11               But for somebody to take that situation and make it spiral into whatever  
12 afterwards? Fuck you. I take a huge offense to that. And I knew that scumbag piece  
13 of shit is the one that helped create that lie. And I hate the fact that he defamed me for  
14 it.

15               BY [REDACTED] :

16               Q Just so that we understand that timeline a little bit, when did that event with  
17 Kylie happen?

18               A I don't know if it was before or after December 12th.

19               Q Right around there?

20               A In and around that time, yeah.

21               Q Okay.

22               Let's talk a little bit -- do you have any more questions on the 12th?

23               [REDACTED]. No.

24               Mr. Funes. Actually, can I use the restroom? I'm sorry. I'm just, like --

25               [REDACTED]. Sure. No problem. We can take another break and go off the

1 record.

2 [Recess.]

3 [REDACTED]. Let's go back on the record.

4 BY [REDACTED] :

5 Q So, if we can just talk a little bit about the period of time between December  
6 12th and the lead-up to January 6th, where were you during that time period, or where  
7 did you go after December 12th?

8 A So, after December 12th, I took a little hiatus and, of all places, I went to  
9 California, which was kind of weird, spontaneous. I had met a friend out there and -- or  
10 in D.C. that lived out there, and they wanted help putting a podcast together that they  
11 wanted to do. So I thought it'd be a good idea. Let me spin my thumbs around and do  
12 something, check out, you know, California.

13 I'm not really a big holiday person. My family didn't really celebrate Christmas,  
14 growing up, so it wasn't really a big thing. So it's not like I have to go first and go  
15 see -- kind of insulting if I weren't to go visit my family during Christmas sort of thing.

16 So I just spent time out in California and just kind of watched and was listening to  
17 and talking to a bunch of people regarding what kind of shitshow was developing and the  
18 drama behind the scenes, because I knew there was going to be drama.

19 Q I know during that time Kylie was also out in California for some of that time.  
20 Did you meet up with her?

21 A Oh, no, that was coincidence. Yeah, no, just coincidence. When I found  
22 out that they were going to California for the bus tour, I'm like, fuck, I want to avoid those  
23 people.

24 Q Okay.

25 We talked a little bit about, kind of, when you understood January 6th was going

1 to be an event. When between December 12th and January 6th did you learn that  
2 President Trump was going to speak at January 6th?

3 A Kind of going similar with the same mantra, like, you know, "prepare for the  
4 worst, hope for the best" type of thing, if we got President Trump to come, what would  
5 he do and how would we handle it. Those discussions were happening since  
6 December -- or, I'm sorry, since November. You know, "Oh, my gosh, what if Trump  
7 actually came?"

8 I know, working on the campaign and official side of things, that isn't so easy.  
9 And, first off, unless you live in Washington, D.C., or deal with the security aspect of  
10 things, like I may have -- or have at some point in time before, the President can only  
11 speak three places in Washington, D.C.: the Lincoln Memorial; the Ellipse for the  
12 National Christmas Tree lighting, the Ellipse area, same as the J6th event; and the U.S.  
13 Capitol Building.

14 But due to separation of powers, there was no way that Trump was going to be  
15 speaking at the Capitol Building. And it was either going to be the Lincoln Memorial or  
16 the Ellipse, if Trump actually was coming to speak.

17 Q But, I mean, when did you actually learn that he was going to speak?

18 A You know, I don't know. It was probably more after January that it was for  
19 sure. The rumor was he was going to speak. "I'll believe it when I see it" sort of thing.  
20 So until the event fully transitioned from a Freedom Plaza event to Ellipse, boom, I knew  
21 the fucking boss was coming. So, for me, it was just more deductive.

22 And when they were fighting about the permit and January 6th and doing stuff  
23 like that, I'm like, well, Trump's never going to come to Freedom Plaza, so if you  
24 have your -- if Women for America First or whoever has a permit for Freedom Plaza,  
25 Trump ain't coming. I can assure you that.

1           Q    Okay.

2           So you were in California.  We talked about Kylie being in California.  I just also  
3        recalled that there was an individual on the bus tour we haven't talked about yet but who  
4        was in California with Kylie, and that's Scott Johnson.

5           A    Oh.

6           Q    Do you know Scott Johnson?

7           A    Gosh, that weirdo guy.  I don't really know who Scott Johnson really is,  
8        other than Jennifer Lawrence's buddy that she met while they were getting their nails  
9        done in the same frickin' salon.  How kind of foofy and weird is that?

10          Q    And when was -- do you know when that was?

11          A    I have no idea.  That was their story.  I don't know.  That is another  
12        weird character.  And I don't know what kind of sabotage or fucking plant or stories or  
13        stupid shit he was inserting into the whole mix, but he had a very confidential and good  
14        relationship with Jennifer and Dustin.

15          Q    Was he involved in the November rally?

16          A    Have you ever been a part of a project where everybody's busting their butt  
17        and everybody's contributing and doing things and there's just people that are there on  
18        the sideline and they're just kind of there?

19          Q    I think we've all had that experience, yeah.  And so that was Scott Johnson  
20        on the 14th?

21          A    That was Scott Johnson for any time he was on the bus tour.

22          Q    Okay.  So he --

23          A    Just a nice enough guy.  Supposedly dying of cancer, a cancer survivor, and  
24        this and that.  You know, he's got to have his collagen injections to save him from his  
25        migraines and this or that or whatever.  I don't know.

1           But exclusive relationship with Jennifer Lawrence and Dustin Stockton is what I do  
2 know and why I have never talked to him and avoid talking to him.

3           Q    Okay.

4           A    There's another gentleman that you should be aware of.  Rod -- not Rod  
5 Thompson.  I'll get back to him.  But he was another guy that came out of Tennessee  
6 that was a weirdo who was helping with our staging for our events and bus tour that  
7 became a very controversial figure.  Dustin Stockton supposedly vetted him.  I know  
8 Charles Bowman paid him to go do an event and spy on it, basically, after the fact.  
9 Something Thompson from the bus tour.

10           Don Thompson.  Bam.  That guy was fucking weird.

11           So this guy, Don Thompson, was from Tennessee that Dustin Stockton brought on  
12 board because he vetted him -- yeah, because Dustin Stockton is trustable -- and he was  
13 the one that built the stage and kind of created some of the stuff and set up for the  
14 event.

15           This guy was fucking weird.  This guy had problems.  This guy was talking to  
16 himself.  He was having repetitive conversations with himself.  He was just totally, like,  
17 panicky, very skittish, was making things difficult.

18           As a matter of fact, after one bus tour stop, an event, I think the one in Georgia as  
19 a matter of fact, that guy said that he was going to fight me and he was going to punch  
20 me in the nose in front of everybody.

21           And after that conversation, they were saying, "Hey, Jason, you know, I don't  
22 know if you can be on this bus tour.  You know, we can't have you starting trouble."  I  
23 was like, "Were you not just here for the conversation where this guy threatened to  
24 punch me in the face and got up in my face and I smiled?  How am I being the one on  
25 the outs?"  And Dustin was heavily leaning towards, "Well, we can't do without Don

1       Thompson."

2           And I was fucking looking around, thinking, like, who the fuck is this guy? How is  
3       he creating so much sabotage? Apparently he was having longwinded, drawn-out  
4       conversations with Kylie Jane Kremer and having all sorts of weird fucking -- he was just  
5       weird. Everybody on the bus tour knew he was weird. But Dustin validated him.  
6       Charles supported Dustin's validation of him. And Amy just felt bad for the guy, because  
7       he seemed like a loser on the down-and-outs and we just gave him something to do.

8           So that was one of the big reasons there was, like, a headache for me. Let me do  
9       my fucking job. I don't care. Take care of the stage. But if I ask for it to be built here,  
10       if I need it to be here, or we have security and other stuff here, and I don't have a chance  
11       to explain myself, listen, just do what -- we're working together. We're not competing  
12       here.

13       Q     Right.

14       A     And that was a pain in my ass from the beginning. And Dustin Stockton is  
15       the reason he was there.

16       And Charles Bowman paid him a couple thousand dollars to go to Oklahoma to  
17       some frickin' event after J6 and all of the stuff. I'm like, hold on. How are you keeping  
18       in touch with this guy? You know he's a scumbag. I think he stole my cell phone and  
19       stuff out of my safe. I was never able to get access to it after I put it in the U-Haul.  
20       This guy just threatened to punch me in the face, almost started a conflict in front of you  
21       guys. And yet I'm the guy that's on the outs and starting problems? What the fuck is  
22       going on here?

23       So that was one of the reasons I'm like, eh, I'm outta here.

24       Q     Gotcha.

25       A     So Don Thompson. Fucking look up that guy's sketchy past. I don't know

1 who the fuck he is.

2 Q Just trying to kind of pick up the thread on a couple other things around this  
3 time between December 12th and January 5th, I know we discussed that you were  
4 familiar with Bianca Gracia and Latinas for Trump. Were you in communication with her  
5 at this time between December and January 6th?

6 A The reason I got involved and helped them -- first of all, the Latinas for  
7 Trump coalition director that's part of the campaign is a useless piece of shit. That was  
8 a fucking little girl that had no idea what the hell she was doing. She sucked. Our  
9 Latina coalition for the campaign was awful.

10 Q And that's not Bianca Gracia? This was someone else?

11 A Official Trump campaign.

12 Q Okay, gotcha.

13 A Our national director for Latinas for Trump sucked. She was a little -- who  
14 knows who her parents are or how she got that job. She has no skill set. She barely  
15 spoke Spanish. She has no contacts. And she was awful.

16 So I say that because, listen, Bianca's doing something, right?

17 Before -- I might have met her, actually, before the December event -- or, no,  
18 maybe it was before January -- in person, just to have a real quick conversation.  
19 Because I had met her and I saw her there and, like, "Hey, I just wanted to actually get to  
20 know you," or, like, "Hey, I know you do Latinas for Trump. Like, what is that? Like,  
21 how are you guys doing?" Like, you know --

22 Q This is -- sorry. Are you talking about Bianca Gracia?

23 A Bianca Gracia specifically, yeah.

24 Q Gotcha.

25 A So, like, unknown quantity. Like I said, I worked on the '16 campaign. I

1 think she didn't even speak Spanish very well back then, right? And so, hey, listen,  
2 people improve. I don't shit on anybody.

3 I think the most beautiful thing about the Trump movement was it was just  
4 grassroots people from nowhere that never got involved in politics. I kept hearing about  
5 how in '16 and 2020 were the first time people had ever voted in their lives. And I'm  
6 like, these people are all in their 60s and 70s. How is this the first time you vote?  
7 That's crazy to me.

8 Q What's the event that you think you ran into Bianca Gracia at?

9 A I had a beer and met her son and her husband -- maybe it was leading up to  
10 December 12th, perhaps?

11 Q Sometime in December. That's okay.

12 A I can't remember, yeah.

13 Q If you can't remember a specific date, that's fine.

14 A It was somewhere in between, because I had met with her before.

15 The reason I had interacted with her before January 6th was because I was helping  
16 the Medical Freedom Group -- who I kind of called them that, but it was Charlene  
17 Bollinger and the people who pulled the permit behind the Russell Senate Building.

18 Okay?

19 So I find out before January 6th that Ali is doing this event at the Capitol Building.  
20 I actually go from California to D.C. on January 2nd just to go fucking find out what the  
21 hell he's talking about and go see it myself. I mean, like, yo, he scored a juicy spot.  
22 This thing's awesome. Great backdrop. You could -- this is a [inaudible] La Rosa (ph)  
23 for me. I would have a great time setting up an event and stage and speakers and  
24 setting this up. Like, he's got a great view from Lot 8 at the Capitol Building.

25 But there was a lot of controversy, this and that. I just wanted to go see it and

1 kind of poke my nose around, right? And by this time, I was kind of a little bit more  
2 arranged to helping Cindy Chafian, so I had a reason to be there nonetheless. I just  
3 wanted to be there ahead of everybody and scope it out.

4 So, through Bianca and through a couple other people -- I want to be careful on a  
5 name who I met, because I don't know if this is a good person, a bad person, if they got  
6 taken advantage of, but you gotta see the permit holders for that. Hopefully, you guys  
7 have pulled that and hopefully talked to people.

8 But there was a Russell Senate Building event that was going on, and I wanted to  
9 do everything I could to make other people's events look good. Ali, not so much. But I  
10 wanted to make sure that January 6th day's events were phenomenal, they were up to  
11 the par of the caliber of events that I've had the history of putting together, and I wanted  
12 them to shine.

13 I wanted them to be -- they wanted to have people like Simone Gold and doctors  
14 and people in the medical industry that are gonna talk in some realities and say some  
15 things that are controversial and blow the whistle on a couple things about COVID,  
16 especially during that time -- it was a hot issue -- and they're gonna bring some people  
17 out and they're gonna help shed some light on this issue. Fine. Great. I'm with you.  
18 Let's go. What can I do to help you?

19 Actually, hey, Bianca, your place is great. What are you guys doing with your  
20 stage? How are you going to set it up? Which way is the direction? I don't know, I  
21 don't know, I don't know. Well, fucking figure it out. You guys are going to look like  
22 shit. What do you mean?

23 So she put me in contact with somebody, and I literally arranged to meet with  
24 them and their vendor who they're working with, and we did an advance trip, and I built  
25 out the stage for them.

1                   **[REDACTED]**.   Was that Marshall Lazard?

2                   Mr. Funes.   Perhaps.

3                   **[REDACTED]**.   The people -- well, the organization on that permit is Virginia  
4   Freedom Keepers.

5                   Mr. Funes.   Yes.

6                   **[REDACTED]**.   It's Marshall Lazard.   Christina Skaggs was another person on that  
7   permit.

8                   Mr. Funes.   They were listed on that permit, yeah.   So I just -- for right now, I  
9   just would rather just not say, but you can probably guess to who I met with.

10                  But, yeah, I took a trip of the ground with their vendor --

11                  BY **[REDACTED]** :

12                  Q    Can you just describe to us or give -- help us understand why you don't want  
13   to say who that individual was?

14                  A    Listen, the Federal Government sucks right now, okay?   If you're in the  
15   military and you're a patriot, you're about to be blackballed.   People that don't want to  
16   get the vaccines that are Active Duty that have been there for 5, 10 years, they're afraid  
17   of saying certain things about what's happening.

18                  Again, I don't know if she's a good guy, bad guy, or indifferent, but I know she was  
19   working hard to protect their family from getting attacked because of their associations  
20   to certain things and certain activities, and they don't want to have their sole  
21   breadwinner lose their job and be at risk.

22                  So, no, I'm not going to say the source and who that was.   You guys have to  
23   figure that out.

24                  Q    But this is just the individual that Bianca put you in touch with and that you  
25   helped set up their stage for the event.   Okay.

1           A    I worked with the vendor like I do with any actual professional event that I  
2    would ever do.  We painted a picture.  We look at the stage, we look at the grass and  
3    the area.  What's a good, productive shot?  What's a backdrop?  Where's your power  
4    going to be?  Do you have a generator?  Where are you going to put your speakers  
5    and, you know, your mixers and all that stuff?

6           And I hooked them up.  I did my job for free.  I don't have to get paid to do the  
7    right thing.  I just wanted January 6th to be a magnificent display of patriotism, people  
8    asking questions, and going out there and showing their concern peacefully.

9           Never anything have I ever done has crossed the line.  I've done mixed martial  
10   arts.  I know how to fight.  That's not -- that's stupid.  When it comes to that, you've  
11   already lost.

12           Q    So, at this point in late December, you're helping Ms. Gracia with this event.  
13    I also just wanted to ask you, are you familiar with, around this timeframe, an event  
14    where Ms. Gracia goes to the White House with some of her team?

15           A    No, I did not know that.

16           Q    No?  Okay.

17           So, then, moving forward towards the 6th --

18           A    All I know is Robert Caron helps her fucking get a lot done.

19           Q    Okay.

20           So you arrive back in D.C. on January 2nd.  Is that what you said?

21           A    Yeah.

22           Q    Okay.  And so you had come back to figure out what's going on on January  
23    6th, but also you're working with Cindy Chafian at that point?

24           A    By that point in time, I had made arrangements loosely, if not, like, in  
25    writing, that, yes, I was going to work the January 5th event and help her do the advance

1 lead and help her set up and do all that stuff. And so there was a loose conversation.  
2 At that point I'm not sure -- I'm pretty sure I was already kind of set in stone that it was  
3 gonna happen. I think I sent her an invoice maybe the next day or something, but it was  
4 already kind of agreed upon that she was gonna pay for my hotel, my expenses, and to  
5 pay me for working that event.

6 Q Okay.

7 And then, obviously, we've talked a lot about November and December, the  
8 security setup. And now you're working with Cindy Chafian and presumably Scott  
9 Chafian for January 5th. Is it the same security?

10 A Well, here, that's the thing. You can't say that it just now started. Like,  
11 Scott was always in charge. Scott was always doing security.

12 Q Sorry. I don't mean "now" as in you weren't previously. I just mean, is  
13 the security picture for January 5th --

14 A It's cookie cutter.

15 Q -- the same? Okay.

16 A Cookie cutter, except January 5th sucked. Our security sucked. I was  
17 multiple times trying to get people that were harassing the press area -- on three  
18 occasions I asked for people to get kicked out, and Scott fucking called it down. I was  
19 pissed.

20 Q Why is that?

21 A Because when we have unruly people trying to fuck with the media and  
22 giving them a hard time, we should get them the hell out of there.

23 Q Not why were you pissed. Why was Scott Chafian not having them  
24 removed?

25 A I don't know. Ask him. "What the fuck is your problem, man?" These

1 people are obvious agitators. They're harassing just not the crowd but members of the  
2 press.

3 Listen, as adversarial as Trump or the administration or the campaign or anybody  
4 is with the press, we treat them with white gloves and kid gloves, however you want to  
5 say it. Listen, we're not here to create problems. Whatever you deal with or whatever  
6 happens, look, we'll try to behave, you know, try to calm down.

7 But, listen, when the press is getting harassed and people are feeling  
8 uncomfortable and things are happening that are unruly, we need to settle that shit  
9 down, because I don't want that to be the story.

10 Q For --

11 A And fuck Scott for not removing those people, multiple times.

12 Q Right. I'm sure that didn't help.

13 A Like, how am I supposed to keep people safe and dedicate myself to keeping  
14 an event safe, yet shit is getting out of hand, and you're letting it happen.

15 Q On January 5th, was Charles Bowman still involved in arranging security?

16 A His fingerprints were all over the place.

17 Q Did you interact with --

18 [REDACTED]. Well, time out. On that, do you mean it looked the same, and so  
19 you assumed? Or do you know whether he was involved?

20 Mr. Funes. I know he was involved on the same extracurricular activities as he  
21 was the 12th of December. He had his fingers in the pot and was stirring it with  
22 whatever he was doing, and he was doing it again for the 5th and 6th.

23 BY [REDACTED] :

24 Q How do you know that for the 5th and 6th?

25 A Because his people were some of the security people that were outside

1 supposedly where the magnetometers were and he was arranging or helping coordinate  
2 who those people were going to be.

3 Q And you knew they were his -- how did you know they were his people?

4 A Listen, if he goes and he's in the middle and he knows where people are  
5 going to be, like, hey, I don't know whose they are, but as far as I'm concerned, like, you  
6 got some fucking swing on this. So, I mean, I'm going to call them his. I mean --

1

2 [2:16 p.m.]

3 BY [REDACTED]:

4 Q And do you know who those people were?

5 A No. That's what I mean. I met these people at the moment, right? I just  
6 see people that are standing there, Secret Service is standing behind them, and the, you  
7 know, magnetometers. When I walk up to the Ellipse event on the 6th, like, Secret  
8 Service knows they're there, they're helping people, like, remove backpacks and put  
9 things into a pile and, you know, make sure they try to get them back to people.  
10 Hopefully, they did. Hopefully, they didn't rob everybody.

11 But, like, yeah, there was militia-type groups outside of the Ellipse event and that  
12 was coordinated. It wasn't them just standing there by chance.

13 Q Was that the first you had seen of Charles Bowman since you got back to  
14 D.C.?

15 A I mean, I think, there was a couple days that we were there obviously in D.C.  
16 before the big event, so no. I mean, whenever the bus tour had returned, I'm  
17 pretty -- I'm pretty sure he was on it. If he cut off or splintered off and got there ahead  
18 before it or after, you know, but it was around the same time.

19 Oh, as a matter of fact, that reminds me. Cindy Chafian was very particular in  
20 regards to maintaining control of the VIP tent for the December 12th and the January 5th  
21 one. She was, like, this high and mighty, "Oh, I'm the one that's taking care of  
22 everybody. Staci Burk has got to be so important, she's got to be really protected."  
23 And can't say -- I didn't know who Staci Burk was at the time. Like, who the hell is this  
24 lady? She was kind of obnoxious. Sorry to judge or say, but I don't have time to get to  
25 know and I'm not here to handshake with everybody, but it was just really weird.

1                   Roger Stone, his madam, and all this other shit that was going on in the VIP tents.  
2                   Scott and Cindy Chafian were abreast of everybody and anybody who was going to those  
3                   VIP tents. Were the Kremers or Kylie and Amy? Hell, no. They knew for sure,  
4                   because they were the help, but I think the last line to yea or nay most of that stuff, right?

5                   So, yeah, we had some characters in December and January 5th in that VIP tent, in  
6                   those VIP tents.

7                   Q     Did you hear any -- just still on Charles Bowman -- did you hear any specific  
8                   plans from him about coordinating with either Proud Boys or Oath Keepers like you did  
9                   for the December rally?

10                  A     Listen, same things goes, those same conversations, you know, that, "Hey,  
11                  we're doing, talking, or trying to work with." To what degree, I don't know. I just kind  
12                  of let it be, you know, especially because we were talking probably more along the lines  
13                  of January 5th. Again, that was my job. I was being paid to do that. I was going to do  
14                  it and do it well. January 6th, not my fucking problem.

15                  Q     Given what you had seen in December with the Proud Boys, were you  
16                  concerned about them being involved on the 5th or the 6th?

17                  A     Yeah. Just really weird that, "Oh, we're not going to wear our colors and,  
18                  you know, oh, this is" -- like, after all that hoopla, hoopla, you're just going to drop it now.  
19                  That seems so odd and out of place. Like, to me it just seemed like such a cover,  
20                  especially when Enrique Tarrio got arrested.

21                  Oh, as soon as you pass D.C., you know, oh, you know, it had to have  
22                  been -- Roger Stone sent out a text message saying that evidence was planted on him and  
23                  that they falsely arrested him and that they're targeting him and, oh, my gosh, he was on  
24                  the phone with press even at the time, how dramatic, that that's when 15 cars came up  
25                  and nabbed him up.

1           Because his story was that he couldn't find his suitcase on the carousel when he  
2        flew into DCA and that the attendant for the airline company baggage area gave him his  
3        bag.

4           He got into an Uber or taxi or whatever it was. He was on the phone. And as  
5        soon as he got into the District of Columbia, they nabbed him.

6           And then, come to find out, it's got frickin' Proud Boys' symbol magazine  
7        cartridges. That guy knew it was on him and what was there. That was a bullshit story.

8           And the first thing that Jeff or Biggs did -- I don't know his first -- Biggs did was contact  
9        Matt Couch to tell him the sob story. "Oh, no, I got to get online and get on my  
10       Periscope and, you know, we got to defend Enrique."

11          Hey, listen, if evidence was planted on him and he got fucked the way they  
12        pitched it the first time, yeah, that's fucked up. But it's Roger Stone we're dealing with.  
13        He's all sorts of full of shit. All of that was a lie.

14          And that's how I knew something -- something fucking sketchy was going on.  
15        Because, as a matter of fact, I spoke to Enrique Tarrio himself directly and I have another  
16        person as a witness that was on the phone for about an hour and he told me himself that  
17        he was somewhere across the river by where CPAC is and the MGM Grand is, and he was  
18        in communication with 75 of his Proud Boys via walkie-talkie phone and even video real  
19        time of what was going on.

20          "Oh, no, but it was not his Proud Boys. No, no, no. They didn't go in the  
21        Capitol, they didn't create chaos. No, no, no. I know for a fact because I was talking to  
22        them."

23          Well, what the fuck, man? Everybody thought you were in jail on January 6th.  
24        What do you mean you were just fucking sitting in some fucking hotel room or some  
25        Federal facility or where the "F" you were, coordinating with 75? Yeah. I'm, like, 75?

1     Why are you being so adamant about 75?   Are you keeping track?   Do you have an  
2     Excel sheet somewhere?   Like, how did you hand select and pick your 75 Proud Boys?

3           Q     When was this phone conversation?

4           A     This phone conversation was after January 6th occurred.   And he himself  
5     told me that he was in direct communication with Proud Boys and 75 of them that were  
6     there at the Capitol Building that day.   "Oh, but, he had nothing to do with it because he  
7     got arrested.   He had nothing to do with it."   Great alibi.   That's a fucking falsely  
8     created alibi.

9           Q     So just back to the 5th and these plans with Charles Bowman and whoever  
10    else might've been involved that roped in groups like the Proud Boys or the Oath Keepers.  
11    Again, looking back at December 12th, was there any conversation or do you remember  
12    anybody raising concerns about involving these groups in security?

13           A     Oh, if Amy would've found out and known -- listen, Kylie, maybe, like I said,  
14    she's a little young, ambitious, and maybe just got led along by Dustin and Charles that  
15    they had it, right, and there was going to be just kind of their own thing or whatever  
16    they're doing, like, they were going to probably do it anyway is the fucking thing, okay?  
17    That's how they fucking roll.   All right?

18           So -- but if Amy would've found out, she would be pissed that that would be the  
19    case, that, we would ever even be trying to coordinate and do some shit.

20           I was semi-okay with it just for the simple fact that, listen, Cindy Chafian cut me  
21    out of every security meeting.   I had no idea what security we have until I get there.  
22    That's fucked.   Whatever -- fine.   Go forth and do great things, man.   I don't want to  
23    know the details.   But if you're telling me that we're going to be safer because you're  
24    doing this, fine.   I had no idea what it was going to lead up to.

25           Q     Just some quick specific details on Cindy Chafian and your arrangement with

1       her.

2           Do you recall how much she paid you for the 5th?

3       A    Oh, shit. I meant to -- it was like 1,500.

4       Q    Okay. And how did she pay you?

5       A    She paid me via Venmo. I was going to say Paypal or Venmo, but Venmo.

6       Q    I want to talk a little kind of generally about the organization of events on

7       January 5th versus January 6th.

8           I know you mentioned the event at the Ellipse and with Women for America First  
9       on January 6th was about unity.

10          Can you describe the relationship between the events that occurred on the 5th  
11       and how they got placed on the 5th and then those that happened on the 6th?

12       A    Two different animals.

13       \_\_\_\_\_ If you know.

14       Mr. Funes. Yeah, two different animals, two different things.

15          It sounded like Cindy was selling blocks of hours of her day's schedule to other  
16       groups to speak and have them control their speakers and whatnot. That's what it was  
17       alluded to and sounded to like me.

18          Whether Alex Jones or Ali actually gave the \$20,000 cash that was rumored for  
19       their spot, I don't know. I know Cindy Chafian tried to charge an exorbitant amount of  
20       money to the pastors, to Pastor Brian Gibson, I do know that, because he told me, that  
21       she was fucking off her rocker.

22           BY \_\_\_\_\_:

23       Q    So what exactly did Pastor Gibson tell you?

24       A    That he was getting charged an exorbitant amount, probably something in  
25       the tune of, like, \$40,000, \$60,000 for the event -- or for their participation thereof, or

1 just a large amount, large sum of money.

2 Q And then did you say there was a broader rumor that these slots were -- that  
3 cost -- that a slot cost \$20,000?

4 A No, no, no. I'm saying the \$20,000, because I was -- I heard a rumor that  
5 Alex Jones or Ali had paid Cindy -- or potentially Dustin -- \$20,000 to have a little slot of  
6 time. Because Roger Stone, Ali, Alex Jones spoke in a little spot and that was the little  
7 Infowar slot.

8 Q And then was there an agreement, once it became clear that the Ellipse  
9 event was going to happen and that the President was going to speak there, was there an  
10 agreement that everybody would focus on that event for the 6th and the other events  
11 would be on the 5th?

12 A Listen, if there was any agreement, it was fucking shit on, stepped on, and  
13 taken advantage of. Because from what I saw and how the things rolled out, whatever  
14 agreements were made were fucking shit on and thrown out the window. Because all  
15 Amy wanted to do was not create drama in the public, to not make the President look  
16 bad with this drama inside that even Trump's own supporters, you know, are rivaling each  
17 other, blah, blah, blah.

18 Imagine what the headlines would have been, especially when your harassment of  
19 press and media is happening on January 5th? There was a problem. Image is  
20 everything.

21 And from what I could tell, Cindy Chafian was the tip of the spear stabbing the  
22 Kremers in the back, because I'm pretty sure she told me. I mean, you guys have my  
23 text messages, or you should.

24 Q We do not have your text messages.

25 A So Cindy Chafian at some point in time thought that January 6th was her

1 event because her name was on the permit. To her it didn't matter it was  
2 @WomenforAmericaFirst.com email address. But that pompous bitch was so hell-bent  
3 on just doing her own thing despite and to spite the Kremers that she was inviting Ali  
4 Alexander and Matt Couch to wholeheartedly run and help her put these events together.

5 And I'm pretty sure -- oh, I gave Cindy a fucking hard time. I went along and  
6 played the games because I wanted to do the event. I wanted to get paid to be in D.C.  
7 I can't fucking afford to pay all this shit out of my pocket.

8 But how dare her? I don't know how long she was on the board for Women for  
9 America First. I know how long she's known the Kremers. But there's a special place in  
10 hell for people like Cindy Chafian and what she pulled or tried to pull on the Kremers, the  
11 public at large, the President, and the entire country.

12 Because she allowed for Alex Jones, Ali Alexander, and she actually invited Ken  
13 Goodwin, a security guard who now people think is an FBI informant that got kicked off  
14 the bus tour, and he was one of the security guards that Cindy brought in that was there  
15 at the Ellipse that was helping her keep an eye on Erica Wulff, which is Alex Jones' wife.

16 So Ken Goodwin, a Black man from here in the D.C. area, probably an FBI  
17 informant, because other people were saying, "Yeah, I think that guy's an informant. I  
18 think he's a rat."

19 So I don't know who or what he was leaking and getting information to, but his  
20 behavior wasn't very admirable. And the fact that he showed up on January 6th and  
21 Cindy Chafian is the one that hired him and brought him on and that he was the one  
22 helping do security for fucking Alex Jones and crew, fucking sketch, dude.

23 Q So did the security apparatus, now that the Chafians are working on  
24 January 5th, were the other folks that were speaking on the 5th also, were they kind of  
25 wrapped up in the same security group under Scott Chafian?

1           A     Everything is always under Scott Chafian, always, from beginning to end.

2     He was the last word on things.  He fucking sucked.

3           I respected him because of his military service or the idea that he was a patriot  
4     and he dedicated himself.  Counterinsurgency.  That's the guy we want for this sort of  
5     job.  Well, fuck, maybe that's the guy that was helping the insurgency.

6           Q     Okay.  Let's talk a little bit about some logistics on January 5th.

7           I believe you told me at that time you were staying at the Sofitel.  Is that right?

8           A     Yeah.  So the days, like, right before, like, the 2 days maybe before I was at  
9     the Sofitel with the block of rooms that were kind of reserved for the 1776 Coalition.

10          Q     Okay.

11          A     So I think I was, like, at another hotel the day before or when I had gotten  
12     there.  But, yeah, eventually, the days leading up, 4, 5, 6, I was probably at the Sofitel.

13          Q     Who were you in contact with the 1776 Coalition?

14          A     Matt Couch was my primary point of contact for a lot of things behind the  
15     scenes, both Ali -- and Ali Alexander and world, he was the head point of contact and  
16     where I was getting the most juice out of him.  He was more in the know than most  
17     people.  "Well, Jason, I'm just, you know, I'm just a guy who's trying to help people out  
18     and, you know, if they're going to give me a chance to emcee, then I'll be more than  
19     happy to do it and I'll get more Twitter followers and this, that, whatever."

20           I was, like, "You're a fat, fucking tard and I don't know who in the hell you came  
21     from or who you are.  All this fucking rumors and all the shit that you have about Seth  
22     Rich who got murdered."

23           Apparently, I think Lin Wood potentially was one of his attorneys out of three or  
24     four that was helping him work on that case.  And now I find out that he -- oh, he told  
25     me, well, fuck him, that he paid Seth Rich's brother a million dollars in a defamation

1 lawsuit and that was a sealed settlement agreement. What the fuck is that about?  
2 How the hell do you have a million dollars?

3 Q Can you just give me a little more detail on the 1776 Coalition? What was  
4 that? And was Matt Couch in charge of that or --

5 A No. He was just a principal, glorified emcee that was gaining a lot of trust  
6 from the Kremers and people, and he had a hot hand when it came to social media and  
7 gathering supporters and gathering likes and spreading the word, which now I think is all  
8 manufactured, but not all, but most of it. Part of the Groyper movement, I'm sure.

9 And so Matt Couch was one of my principal point of contacts between, like,  
10 people, like Anna Kate, Cordie Williams. Matt Couch's relationship with the pastors was  
11 impeccable. They trusted him. He trusted them.

12 So anything that had to do with organizing coalition building, you basically almost  
13 had to go through Matt Couch to do it, which I thought was fucking weird. But he is  
14 good friends with Ali apparently.

15 Q Okay. And then who else --

16 A And, of course, Enrique Tarrio and Biggs and the whole Proud Boys  
17 movement. Matt Couch is great friends with them. Why do you think Biggs called  
18 Matt Couch, the first person he called after Enrique went to jail?

19 Q I was going to ask you a little bit about that. Can you describe a little more  
20 of the relationship or connection between Matt Couch? Did he ever describe to you  
21 how he knows Enrique Tarrio?

22 A This is the thing, I think anybody can create a Twitter account, create a  
23 bunch of bots, create a bunch of followers, and then you're somebody. And then if you  
24 get lucked out and Trump doesn't vet anybody, but retweets and puts stuff out there,  
25 like, you're a star, you're official, you got made.

1                   So Matt Couch is retweeted by the President a couple times leading up and  
2                   apparently he was fucking some big dick swinger in the political movement. And I've  
3                   never even actually heard of him before.

4                   Q     But just, again, did he say how he met Enrique Tarrio?

5                   A     How he met? No. Or how he knew extensively? I didn't know they  
6                   were that big of boys. But I think at the time, I just bought into it as a fact that I didn't  
7                   really know how much or how close of an intimate relationship he had with Matt  
8                   Couch -- or, I'm sorry, Matt Couch with Enrique Tarrio, the Proud Boys -- more than the  
9                   fact that Matt Couch was sticking up for Enrique Tarrio because Enrique Tarrio  
10                   represented something, like, he was kind of on the fringe, but was still maybe looked at  
11                   with some favor, but that he was misunderstood and that, like, you know, they're just  
12                   trying to do the right thing.

13                   And Matt Couch was the greatest apologist for Enrique Tarrio and Proud Boys,  
14                   hence the fact Joe Biggs called him to fucking and Matt Couch instantly went on his  
15                   Periscope and told the world that Enrique Tarrio got set up and that he was -- evidence  
16                   was planted and that he got arrested.

17                   Meanwhile, nobody could figure out what jail he was in, which I thought was  
18                   fucking curious.

19                   Q     So we've talked a lot about the Proud Boys and kind of how you heard about  
20                   them leading into the 5th and the 6th. How about the Oath Keepers? Did you hear  
21                   anybody discuss --

22                   A     You know, I met Stewart Rhodes and stuff after. You know, I never  
23                   really -- I've heard of them. I just blended it in with the rest of them. I know Oath  
24                   Keepers, Stewart Rhodes had been on Infowars and been rah, rah, rah and fucking -- he's  
25                   kind of out there with the eye patch and, you know, he makes himself sensational on

1 purpose.

2 So I don't really have fucking time to pay attention to all these wackos. But I  
3 know he was a known quantity to people, okay, but I really didn't know much about him  
4 or his dealings or what was going on in their role in any of the D.C. events, really, other  
5 than superficially or vaguely or the name being -- Oath Keepers being mentioned by some  
6 of the militia-type groups, you know.

7 But I didn't really have any foreknowledge of Oath Keepers or their role. Most of  
8 everything I learned about them was after January 6th.

9 Q Okay. All right. So you're at the Sofitel January 5th, you work the event  
10 for Cindy Chafian. Let's talk about January 6th a little bit, unless you have any specific  
11 questions on the 5th?

12 A I would say Matt Couch has direct ties and affiliation with Ali Alexander, and  
13 he's the one that helped me get into the VIP section via Ali into the Ellipse.

14 Q This is on January 6th?

15 A Yeah.

16 Q Okay. So let's start there. So you go from the Sofitel --

17 A Sorry. You're asking something else.

18 Q Just kind of setting the stage, but now we're talking about the 6th.

19 A Okay.

20 Q Just describe -- so in the morning, do you just go straight to the Ellipse or  
21 what happens?

22 A I had fucking a long night and day January 5th. As a matter of fact, because  
23 I was trying to make sure I could keep Cindy Chafian off my ass, there's these really big  
24 light towers, diesel-powered generator things that they were supposed to get picked up  
25 the next day. So I was supposed to get them to, like, a corner so the company wouldn't

1 charge them money and have them charged for, like, them putting the equipment back.

2 So in the middle of the fucking night on January 5th, like at 1 or 2 a.m., I'm, like,  
3 "Oh, shit. I don't want to hear that bitch bitch at me." I left the lights over at, like,  
4 where they were. I need to push them to the corner to the sidewalk so the company  
5 can just get their truck and put them on. Right?

6 So my dumb ass, like 1 o'clock in the morning, goes to Freedom Plaza by myself.  
7 I even paid a homeless guy to help me on the second one because I just fucking couldn't  
8 do it. Moved those lights.

9 So I was tired. By the time I got back, it was like 2:30. Like, whatever. It's  
10 like, fine, fuck it. I actually woke up a little bit later than I wanted to.

11 But, yeah, when I woke up and I got stuff together, just went directly to the  
12 Ellipse. And, again, that's when I had that -- another, like, interaction with Dustin  
13 Stockton. He was trying to get me to fucking put up a stage at the Supreme Court. I  
14 said, "For what?" Women for America First was having an event at the Ellipse. Why  
15 would you do that?

16 And then when he got pissed off when I asked Amy about it. "Oh, I can't believe  
17 you went over my head, around the chain of command." What fucking chain of  
18 command? I don't have a fucking chain of command. What are you talking about? I  
19 remember him saying that, too. "Fucking chain of command. Went over my head."  
20 Fuck you, dude.

21 How are you going to tell me that Amy and the Kremers want a stage at the  
22 Supreme Court and when I ask her, she says, no. And that's actually probably a bad  
23 idea. And I called him and I say, "No, I'm not doing it. Amy doesn't even know about  
24 that."

25 Q I did want to ask -- so you were talking about the night of the 5th having to

1 move those lights. And I know you were working with Bianca Gracia or, at least, kind of  
2 consulting with her on the event --

3 A I consulted solely, yeah, for the advance setup, how to get the President's  
4 speech live streamed to that event. That was like my --

5 Q On the 6th?

6 A Yeah. Because they wanted to make sure and I was -- you know, I'm the  
7 creative guy and had ways and ideas of making that happen. So I hooked them up big  
8 time.

9 Q Were you in touch with her on the night of the 5th or on the 5th?

10 A I was in contact with her, maybe still on the 5th. I'm, like, I can't recall for  
11 sure. But I do know that the 6th I was asking her whether she wanted to go to the  
12 Ellipse or to do her event and she was adamant, "No, God told me I had to stay at the  
13 event and not to go to the Ellipse."

14 And then somehow, some way, she was just in her hotel room because she was  
15 tired. What do you mean? You're not at your event? You worked so hard to get this  
16 event together. So you're tired and it's just fucking sit on like a lazy ass in your fucking  
17 hotel room? That doesn't make any fucking sense.

18 And so at some point in time, I don't know if it was the 6th or something,  
19 that -- like, I was saying that, hey, if I come over, because I was seeing shit unfold on TV at  
20 the Sofitel Hotel, I was, like, yo, if I come over there and I have some people with me, like,  
21 can we just -- you know, if shit gets bad, can we just hunker down at your place?

22 Because she was at the Phoenix Hotel that was kind of closer to the Capitol  
23 Building? And she said, yeah. But nobody had the balls to actually go out there and  
24 figure out what was happening.

25 Q When did you ask her that?

1                   A     I remember vaguely having conversations reaching out to her. I don't know  
2 if it was the 5th. It had to have been the 6th, because, like, I remember referencing her  
3 place and her hotel room as, like, a safe spot. If it went from the White House, basically,  
4 all the way to the Capitol Building, we're, like, more than a mile away. If shit hits the  
5 fan, where do we go? As a security guard, I want to have a regress area station,  
6 somewhere we're not caught trying to break in through the Mall and one-mile run.  
7 Right?

8                   So, like, "Hey, Bianca, if I go over there and this happens, you know." "Okay,  
9 sure, cool. But I'm just staying in my hotel room," rawr, rawr, rawr. Okay, cool.  
10 Whatever. Fuck it.

11                  Q     Did you ever have any conversations with her about being in touch with  
12 Oath Keepers or Stewart Rhodes?

13                  A     Man, I had no idea who Bianca Gracia was really getting helped by or who  
14 she was talking to. But as soon as I found out that Enrique Tarrio was one of her  
15 founding board members and that there's a CIA generational asshole named Robert  
16 Caron -- C-a-r-o-n-e (sic), I believe -- that's her handler and helped her create Latinos for  
17 Trump and has given her information on where to go and how to do events, like  
18 throughout the years.

19                  And then I also find out and hear that she's got FBI handlers that talk to her and  
20 give her information. And I already know how fucking dirty and sketchy Enrique Tarrio is  
21 rumored to be and is probably more so than is just rumored to be. Yo, I fucking -- I had  
22 some really big red flags.

23                  Q     But short answer being on the 5th and 6th you didn't talk to her about  
24 Stewart Rhodes?

25                  A     No. No. At that time, never. I would've never have even known to ask.

1           Q     Okay. All right. So you described to us that you were -- you got to the  
2     Ellipse and you were let into the VIP area. And I know you had some further details on  
3     how that happened. Can you just tell me?

4           A     No. It was just weird. There's, like, a weird energy. I don't know what  
5     rumors had been spread about me. Obviously, I'd just worked with Cindy Chafian for  
6     the 5th event. I don't know if I was being shunned for helping her and not being a part  
7     of the 6th when the 6th was another animal. I wasn't going to get involved late in the  
8     game, you know.

9           If I wanted to be there or anywhere, all I had to do was call Amy and she would  
10    have taken care of me, right? I have a good working relationship. There's no reason I  
11    couldn't have been. I'd worked my fucking ass off for months to help them create that  
12    event, right?

13           But when I was -- I was pissed more at Dustin that he's telling me to miss the  
14    Ellipse event, so I can go put the Supreme Court stage up.

15           And I said, "Fine. If I do that, are you going to give me a VIP pass so I don't have  
16    to deal with the press and I can get there just in the nick of time after I set it up and I get  
17    there and I don't have to deal with the crowd?" And he couldn't even fucking tell me  
18    yes to that.

19           So I was, like, fuck you. Why would I do that? And then I called Amy and I  
20    found out she didn't approve of it. So that sounded even more ridiculous.

21           So I was kind of on the outside, like, you know what? Fuck these people. I'm  
22    going to go to the Ellipse. I've worked my ass off, I know enough people, I'm not even  
23    worried about it.

24           And it was just by chance that I ran into Matt Couch out of a fucking sea of people,  
25    which is crazy, it's nuts, and his security guards that he had.

1           Q    Do you know who his security guards were?

2           A    I don't know if it was Ivan Raiklin.  It was a guy that fucking looked eerily  
3    similar to him if it wasn't.  He was introduced to me as Jason, I remember, because  
4    fucking my name is Jason, right?  And then you had another taller gentleman, skinny,  
5    thin-set, that was his executive protective detail, security detail.

6           Q    Okay.  So you run into Matt Couch on the way to the Ellipse and he gets  
7    you into the VIP?

8           A    Yeah.  Of course, we were staying at the same hotel room and block and,  
9    you know.  Yeah, I had kind of got a late start to that morning and day, more so than I  
10   wanted to.  And I just kind of left independently, wade through the people.  I was, like,  
11   oh, shit.  Hey, what's up?  Hey, let's go in.  Oh, cool.

12          Q    Okay.  So just keep walking me through the day.

13          So you get to the Ellipse, you're in the VIP section.  How late do you stay?

14          A    Oh, I stayed till the end.  Yeah.  Actually, I'm sorry.  I think this thing is  
15    like bothering my stomach.  Do you mind if I use the restroom again?

16          [REDACTED].  No.

17          Mr. Funes.  Is that cool?

18          [REDACTED].  Go for it.

19          [REDACTED] Let's go off the record.

20          [Recess.]

21          [REDACTED] All right.  We can go back on the record if you're ready.

22          BY [REDACTED]:

23          Q    Okay.  So I think you were just about to tell us that you stayed through the  
24    Ellipse -- or through all the speeches at the Ellipse.  And then next, what did you do?

25          A    Also, just before I had a thought to make sure to correlate Kellye SoRelle's

1       role and Stewart Rhodes' planning and gearing up for January 6th and Robert Caron's  
2       know-how about Stewart Rhodes' potential planning of that day and especially after the  
3       fact.

4           Q     Are these -- this is information or conversations that you had or, like,  
5       first-hand experiences you had with either Kellye SoRelle or -- okay.

6           A     So Robert Caron is CIA, generational, who's been meddling in politics, been  
7       helping people like Bianca Gracia. And Kellye SoRelle was in a relationship with Stewart  
8       Rhodes' girlfriend, apparently was boasting about, and the events leading up to  
9       November and December. And I think Kellye SoRelle had a lot more to do with Stewart  
10      Rhodes' propensity to be an absolute useful idiot that day.

11           And to cover his ass and the ass of other Oath Keepers involved, even though they  
12       probably have some criminal activity that they should be charged for. Kellye SoRelle is  
13       privy to most and all that conversations as her attempts to keeping client-attorney  
14       privilege.

15           Q     Have you met Kellye SoRelle?

16           A     Fuck, yeah.

17           Q     Okay. And when did you meet Kellye?

18           A     After January 6th.

19           Q     After the 6th. Had you ever spoken to her before the 6th?

20           A     Never. I now realize that she was somebody inside of the Friends of Roger  
21      Stone chat.

22           Q     Friends of Roger Stone chat?

23           A     Friends of Stone -- FOS, Signal chat, Friends of Stone.

24           Q     This is a chat that was going on leading up to the 5th or 6th?

25           A     After. After the 6th. I think I got added on to that afterwards. And I

1 was challenging Ali Alexander and his role for the mayhem on January 6th ever since the  
2 beginning.

3 Q Okay. Let's try to -- we'll try to move chronologically. So we'll address  
4 stuff after the 6th after that.

5 So at what point -- so at some point you returned to the Sofitel from the Ellipse  
6 and then decided to go towards the Capitol. Is that right?

7 A Yeah. So when I was watching the mayhem unfold on TV. It's funny  
8 because there was even -- dang it. Jeanine Pirro. No, that's not the judge's name.  
9 Jeanine Pirro.

10 Anyway, one of the news anchors, a blonde from FOX News, there was a screen  
11 shot or a screen of Freedom Plaza just kind of camera just kind of held there. Well,  
12 there was a bunch of mayhem, they were having a bunch of cut shots, Capitol Building  
13 and all this other stuff.

14 At one point in time there was even Alex Jones walking across Freedom Plaza on  
15 national television with like a mob of little security guys around him, like walking towards  
16 the Willard, because that's where the fucking Freedom Plaza is kind of, right?

17 And as the chaos is unfolding on TV, the FOX News anchor, "And there's" -- and  
18 then she was about to say Alex Jones' name and totally like spaced. They didn't say it.  
19 And it was, like, "Oh, well, moving on," and then started talking about something else  
20 going on.

21 But there was video footage on FOX News of Alex Jones traveling back to the  
22 Willard Hotel just secured by his own security team. Meanwhile, it seems like Ali  
23 Alexander went with Jack Posobiec to the OANN rooftop to create an alibi for himself.

24 BY [REDACTED] :

25 Q Jack who?

1           A    Posobiec.

2           Q    Do you know how to spell that?

3           A    It's a weird spelling. P-s-o-b-e-i-c or something like that.

4           Q    Okay. So I think, just to focus us a little bit more because there's a lot that  
5   happened on January 6th, and you, obviously, we know from what you've said, did a lot  
6   after January 6th to understand what happened that day.

7           I think [REDACTED] questions are, what did you specifically do and what did you  
8   specifically see on that day, if that makes sense.

9           A    Yeah, but I think it's in context. I want to interject that other stuff.

10          Q    Understood.

11          A    Because it's the point for your investigation and if you guys were going to do  
12   anything.

13          [REDACTED]. So you're sitting in your hotel. What triggers you or what makes  
14   you decide to go towards the Capitol?

15          Mr. Funes. I couldn't believe what I was watching on TV. It just seemed so  
16   surreal. Like, another Twilight Zone moment. Because I went to bed on November 3rd  
17   with a couple hundred thousand lead -- vote lead in Pennsylvania and other States, and  
18   when I woke up November 4th, it seemed like the whole world turned upside down.

19          The same thing kind of happened on January 6th. The Ellipse event was great,  
20   magnificent, beautiful. Then we're walking back like pigeons because it was so packed  
21   and we're one of the last people, we're all the way at the front. So it took us a while.  
22   And I'm pretty sure we even heard rumors of a young girl getting shot and killed at the  
23   Capitol, just word of mouth, leaving the Ellipse. Right?

24          Like, there was a lot going on. And, like I said, I saw this on TV. And I've been  
25   around the Trump world and the MAGA movement for 5 years and that is not how we

1 behave. That is not acceptable behavior. In my mind, that was not us. That's the  
2 stuff you see in TV on the weekend, Ferguson, Missouri, or anywhere else in the country  
3 that things get burned down, looted, and those are the knuckleheads you get.

4 In 2017, January 20th, when Trump got inaugurated, that's the scene that that  
5 looked like. The chaos and anarchy, the lighting of a limo on fire, breaking of windows.  
6 There was even human barricades and chains, me walking through the magnetometers  
7 for the inauguration. That's the first time I'd ever been to Washington, D.C. That's  
8 what January 6th looked like at the Capitol Building.

9 So I couldn't believe it. I had to go see it myself. I couldn't believe what I was  
10 watching on TV. But nobody else had any interest in going. Okay. Fine. Fuck it. I  
11 left. By the time I was just going crazy and mad. I left probably about 3:30 to the  
12 Willard Hotel.

13 I had arranged to pick up a key of one of the golf carts, and I took a golf cart that  
14 was at the Willard Hotel. So I walked from Sofitel to the Willard, I got a golf cart, and I  
15 drove it to the U.S. Capitol Building from there.

16 [REDACTED]. Whose golf cart was that?

17 Mr. Funes. One of Cindy Chafian's organizers.

18 [REDACTED]. And it was just you by yourself on the golf cart?

19 Mr. Funes. On the way there, yes, sir.

20 [REDACTED]. Okay. So what happens when you arrive at the Capitol?

21 Mr. Funes. It wasn't just a smooth beeline. Like, I had to let stuff sink in. On  
22 the right side of the street, in a peaceful manner, you have tens of thousands of people.  
23 You could see the line all the way to the Capitol Building, peaceful protesters. The  
24 people that were at the Ellipse, who we actually are.

25 I mean, you got elderly citizens that are hobbling their butts around because

1       they're elderly and they still walked over a mile to go to the U.S. Capitol Building.  
2       They're leaving because there's curfew, there's mayhem. And we don't do that. We  
3       don't participate in that.

4           The Trump movement and the administration and the man and the people that I  
5       know after 5 years of doing events were not represented by the people there at the  
6       Capitol Building.

7           So I'm taking little video shots of just little blips, because my memory's running  
8       low, of the crowds of people just walking on the right side of the road out of all things.  
9           So when I'm going there, I'm kind of stopping and looking. I'm, like, "What the fuck is  
10       going on at the Capitol Building?"

11           So, yeah, I drove from the Willard to the Capitol Building and I stopped a few  
12       times along the way thinking, like, "What is going on here?"

13           And the closer and closer, you could just feel the energy changing. And by the  
14       time that I got there, listen, I know the mayhem, a mixed bag of crowd, at 1 o'clock,  
15       listen, the tear gas was getting bombed on people by 12:40. Okay?

16           People were raiding. This is the catch of the Federal Government you guys need  
17       to fucking figure out. Breaching what barrier? The whole fucking breaching of barriers  
18       means the outside, the inside, the doors. Was it the soft barricade? Was it the bike  
19       racks? What the fuck is breaching the perimeter mean? That's a blank slot for you to  
20       lose time when you're writing a police report, is what that is.

21           So what the fuck actually happened there that day was allowed to happen, and  
22       there's people hell-bent on going to go create chaos that day and the Federal  
23       Government let it happen.

24           BY [REDACTED]:

25           Q     Okay. So when you get to the Capitol, what do you see?

1                   A     Mayhem. People working in groups of twos and threes, people wearing  
2 bulletproof vests and sea goggles, masks. People that don't remind me -- even some of  
3 the people that were kind of militant looking around our events that were working it,  
4 they weren't dressed all in black like these assholes were. Okay?

5                   So by the time I got there -- listen, I'd been around the Trump world, I don't speak  
6 for everybody, and I can't speak to everybody because there were some idiots there  
7 causing mayhem. But the sight of me at the Capitol Building was people with their jaw  
8 dropped trying to figure out what the fuck was going on.

9                   Meanwhile, you had the whole apparatus of people on the west side of the  
10 Capitol Building what looked like to be strategically working together, bullhorns, the  
11 dress, the flags draped over them, again, groups of twos and these. When I walked in  
12 and was walking up to that, it just looked like they were all in coordination together.

13                  Q     So did you park the golf cart and get out and walk around?

14                  A     Yes.

15                  Q     Okay. Where did -- tell us physically where you were when you're seeing  
16 these things?

17                  A     So I made my way from, I guess, it runs into Constitution? No. Yeah,  
18 Constitution --

19                  [REDACTED]. Constitution runs --

20                  Mr. Funes. It goes straight to the Capitol Building. And normally if you're  
21 driving a car, it's blocked off. You have to make a left. But there's a little pathway  
22 forward and there's a little cul-de-sac right before the Capitol Building, right?

23                  So that's where I dropped off the golf cart and I proceeded to walk up those steps  
24 towards the Capitol Building.

25                  BY [REDACTED]:

1           Q    And how close did you get to the Capitol?

2           A    Oh, I was right outside the west side rotunda -- or not rotunda. I'm saying  
3    that wrong. Going to get me in trouble. Not rotunda, not inside, outside. But west  
4    side of the Capitol Building. And so where the scaffolding and things were going on.

5                   So my issue was, is that Right Side Broadcasting was broadcasting from over there.

6                   Now, mind you, I just did a 2-week bus tour where I spent some time with Right Side  
7    Broadcasting and I knew some of those camera guys and people intimately. I was, like,  
8    "Oh, shit. I need to get those people the fuck out of here. Like, this shit's getting hot."

9                   So I went from walking to seeing it, being more curious, going like, "Oh, I need to  
10   get those people out of here." Like, my safety -- getting somebody safe kicked in.

11                  And by that time somebody asked me, "Oh, do you know Matt Couch? Oh, my  
12   boyfriend is Zach Vorhies. He abandoned me. We were here. I'm a reporter."

13                  And I said, "Well, cool, but I'm going over there to check out what happened."  
14   And, like, go check it out.

15                  "Well, I just got tear-gassed."

16                  I'm like, "I'm going."

17                  It's like, "Okay, I'll come with you."

18                  So Maryam Henein, H-e-n-i-e-n [sic], was somebody that asked me if I knew Matt  
19   Couch. And I said, yeah. And she tagged along with me. And I went to the Capitol  
20   Building, walked up the steps inside the scaffolding -- eventually, over time, right? And  
21   I'm just looking around, too.

22                  I'm bewildered and I'm shocked. There's patriots still trying to tell people not to  
23   do crazy shit. Like, "Stop." Like, "Come on, guys, we can't be doing this." Trying, but  
24   it was unmatched by the people in bullhorns coordinating, "Open the windows. Hey,  
25   guys, we need some supplies here. We need to go grab the ladders." So that blonde

1 chick that's in the windowsill for hours, that's how close I got.

2 Q So you're on the terrace. Sort of are you -- is it packed? You're shoulder  
3 to shoulder with people?

4 A There was different waves and sections of it. It was getting a little thicker  
5 towards the center of it.

6 But I'm the guy that was telling the Capitol Police Department, "Hey, I'm sorry. I  
7 don't know what the fuck is going on here. These people are not Trump supporters.  
8 Just because you wear a Trump hat and you're causing chaos doesn't mean you're a  
9 Trump supporter. Guys, I'm so sorry."

10 And the guys were rattled. By the time we actually got to those -- those were  
11 the big boys. I mean, all these guys were fucking, like, six foot big tall fucking monsters.  
12 Right? I'm, like, grabbing them on the shoulder in the middle of shit and they're, like,  
13 fucking jumpy. I'm like, "Dude, I'm sorry. I'm sorry. I'm just -- like, this is not  
14 some -- I'm so sorry. I don't know what's happening."

15 Okay. So fucking ask the Capitol Police Department. I was apologizing to them.  
16 Because that shit was not us. We didn't come to January 6th Capitol event or none of  
17 the planners and organizers wanted anything to do with the behavior, in fact, we wanted  
18 everything opposite of that to happen.

19 And that's what resulted of it? Fuck that. These people don't represent me.  
20 They don't represent Trump. They don't represent our movement. Yet they made  
21 everybody look bad.

22 I even had my own flesh and blood brother call the FBI on me because he saw a  
23 video of me in the Capitol Building, because he's a liberal and he's a lefty, and I don't care  
24 about your politics, but obviously things like that happen.

25 BY [REDACTED]:

1           Q    I just want to understand kind of what your sort of the subtext of some of  
2 what you're saying.

3           You were focusing on some of the people with bullhorns and that were directing  
4 people?

5           A    Yeah.

6           Q    And then you're differentiating between MAGA people and actual Trump  
7 supporters and then some other group of people that you think were not representative  
8 of you or other Trump supporters.

9           Are you saying that was a particular group?   Or what's your belief about who  
10 those people were that you were seeing there?

11          A    Our people don't chant and yell, "Defund the police."   Nobody in the  
12 fucking MAGA movement does that shit.

13          One of the prime examples of this was a group of three people, and one of these  
14 guys had an American bandana flag around his head and an American flag on a PVC pipe.

15          And he starts bullhorning, like, "Fuck the police, get 'em."   Because there's a  
16 clash between the Capitol Police at that door, like, every so often just would come in  
17 waves.   And it was like words of encouragement coming from the fucking bullhorns  
18 around him.   Like, what the fuck?   Don't encourage that.   We don't want anything to  
19 do with that.

20          And this little cocksucker fucking starts antagonizing with his bullhorn, "Get 'em,  
21 fuck 'em up."   I forget exactly the verbatim words, but something to that effect.   And  
22 as soon as there's another wave of people clashing with the police, he starts walking away  
23 with a smile on his face and rolls up his American flag around his PVC pipe.

24          That's not a motherfucking MAGA supporter.   That guy's in there to fucking make  
25 sure to antagonize and create shit.   So whether you were or weren't, I could give a shit

1 less because even people that were Trump supporters went over their head because mob  
2 rules and you're an idiot for letting yourself be taken advantage of by the fucking mob.  
3 Okay?

4 But there were people there at sunset that were the worst of the worse. You  
5 guys should have the Capitol Building or Capitol Police footage. Those were the fucking  
6 dicks, assholes that do not represent the MAGA movement, do not representative the  
7 President.

8 So whatever happened earlier in the day, I can't attest to that. I'm only an  
9 expert witness to the fact that I was sitting there taking pictures of people with their gas  
10 masks off. Because last time I checked, nobody wears gas masks to MAGA events and  
11 walks around with bottles of baby milk or milk in baby bottles around their belts.

12 And the fact that everything was being kind of coordinated, and when you look at  
13 the greater scope of things, it's just a fact, it's not an assumption, it's not a belief. It was  
14 what was happening.

15 Q We might have skipped over one thing that you had previously told me,  
16 which was, when you arrived at the Capitol, did you see Cindy and Scott Chafian?

17 A Oh, yeah. That's right. Yeah. I sure did.

18 Q Can you just tell us about that?

19 A Quickly --

20 Q Where were you when that happened?

21 A I was, like, there's a couple series of steps leading from that little cul-de-sac  
22 area and across. I was like, "What the fuck are they doing here?"

23 Q So you left where you parked the golf cart?

24 A Uh-huh.

25 Q Were walking towards the Capitol, basically, through the lawn?

1           A    And she had no idea at that point that I had borrowed her golf cart.  
2           Q    And I think that's -- sorry, just one other detail that you had told me  
3   previously I think, but that was Lyndon Brentnall from RMS that gave you the keys to the  
4   golf cart?

5           A    Yes. Yes.

6           Q    Okay. So did you interact with Scott or Cindy Chafian when you saw them  
7   leaving?

8           A    They looked like they just had gone through hell. They looked like shit. I  
9   don't know what the fuck was going on in their heads, but, like, it was fucking weird.

10          Q    Did you talk to them?

11          A    Just in brief. It was kind of like in passing.

12          "Hey, Jason, what are you doing?"

13          "I'm going to the Capitol. Well, I'm going to the Capitol."

14          "Well, just be careful, be safe," whatever, blah, blah, blah.

15          And that was probably the extent of it. I was, like, "What the fuck are you guys  
16   doing here?"

17          Q    And do you know around what time this was that you arrived at the Capitol?

18          A    This had to have been close to, like, 4 o'clock-ish, sunset-ish.

19          Q    Okay.

20          A    And that's where there's videos and pictures of Cindy Chafian with Ken  
21   Goodwin in the massive crowds of people, with Cindy Chafian bullhorning and Erica Wulff  
22   in tow with them. And in tow, I mean, with them hanging out and protected by security.  
23   What the fuck was she doing bullhorning in that crowd?

24          Q    I want to ask about some other things that you saw, kind of in the area of  
25   the Capitol.

1 I know that you've made public kind of your thoughts on the Ali Alexander event  
2 that was supposed to occur after the Ellipse event.

3 Did you see that area -- it's known as lot 8 -- where the Ali Alexander event was  
4 going to be set up?

5 A Have you ever seen the description of an MRI on paper?

6 Q Have not.

7 A Or medical terminology that says X and X site was "unremarkable"?

8 Because it means everything is okay because there's nothing remarkable of mention or of  
9 note.

10 The only times I've seen that area is in the backs of people's photos, pictures.

11 There's no event being planned. \$180,000 worth of money raised is a lot.

12 I know there's limitations and certain parameters you have to meet in different  
13 places. We did just fine throwing up their big stage and getting their event together.

14 So I don't care what soapbox you try to put up there to say that he was having an  
15 event. He went and drove 20,000 to 50,000 people in a frenzy, alongside Alex Jones and  
16 Owen Shroyer, leaving the Ellipse early, before Trump's remarks.

17 And the, you know, "I'll march with you to the Capitol" -- because Trump kind of  
18 says some stuff that gets him in trouble all the time -- they weren't in their seats when  
19 Trump said that. They had left. I wish I would've taken a recording, because I said to  
20 Matt Couch and the people I was with, like, "Why the fuck is Ali leaving?"

21 You know what Ali Alexander told me that night at the 1776 Coalition?

22 Q What'd he say?

23 A He told me he was going to go meet with the President, and that's why he  
24 left. That's what he told me that fucking night, that Ali Alexander made up this bullshit  
25 lie that he was going to be the one -- that he was actually supposed to have a private

1 meeting with the President afterwards, and that's why he left. Only to find out all this  
2 other shit, that he was in tow with Alex Jones and Owen. That motherfucker was lying  
3 since the beginning.

4 Q So let's put a little pin in that conversation with Ali Alexander, and we'll  
5 return to that.

6 So you're at the Capitol. You've already seen Cindy Chafian and Scott Chafian,  
7 and you're on the steps. At what point did you leave the Capitol?

8 A When I got tear-gassed the hell out of there. So by sunset. I mean, things  
9 were unruly. That shit sucked. Like, listen, there should be certain people in jail.

10 Like, not all J6 political prisoners are created equal. In fact, the people that are  
11 pushing that narrative are retards and part of the problem and not the solution.  
12 Because the criminal justice system made an example out of Jacob Chansley and it was  
13 wrong. That guy stopped a guy from stealing a muffin from the cafeteria walking in.  
14 He didn't lay a hand on anybody. He didn't create or antagonize violence. Yet he gets  
15 the same 41-month sentence that somebody else got for fucking attacking a cop and  
16 punching him in the head?

17 What the fuck is going on with our Federal Government where you have to make  
18 an example of people? Because why do you think people don't want to come to you  
19 and tell you the truth? Because you guys are being dicks and you're throwing the  
20 criminal justice system at people, and people are afraid of what you guys are going to pin  
21 on them.

22 Because even people like myself -- "Well, Jason, aren't you afraid that they're  
23 going to arrest you?" I'm not an idiot that went inside the Capitol Building. I didn't  
24 breach and push my way through fucking police. If you fucking come after me, you guys  
25 are fucked.

1           Because people like me went there to go figure out what was happening.  And  
2 even though I started really investigating this technically when Rudy Giuliani brought me  
3 in on January 8th to talk to me about it, everybody should've been wanting to talk to me  
4 for the last year.  I was willing to talk.  I didn't have all the answers.  I needed people  
5 with badges that could get warrants so you guys could do your fucking job, not twiddle  
6 your thumbs for over a year with your heads up your asses trying to figure out what  
7 happened.

8           I've been out here trying to get information to people like you and people inside  
9 the Federal Government, and they wanted nothing to do with me.  And shame on the  
10 entire fucking Federal Government for that.

11           Q     So if we can focus on the details for the 6th, because that's the information,  
12 right, that you have to give us and that is true we're interested in.

13           What caused you to leave the Capitol on the 6th?

14           A     I was tear-gassed out of there, like I said.  It was sunset.  By that time,  
15 they were just getting everybody out.  The sun was going down, if not down already.  
16 Muriel Bowser emergency text messages.  There was a curfew.  Everybody had to go  
17 home.

18           I was just there to watch and see what was going on.  There's videos of me  
19 fucking telling people to stop doing the stupid shit that they were doing, not because I  
20 was trying to create an alibi or some fucking -- "Screw you.  What the hell is wrong with  
21 you people?"

22           And then there's video, "Oh, we're just here to grab people out by the collar and  
23 to occupy the building.  And, you know, we're not here to do anything violent.  We're  
24 just going to drag them out by the neck and, you know, let them know that we're here."

25           What the hell kind of stupid rhetoric is that?  And why are these people standing

1 in the same position for hours all day in the same coordinated spot playing the same role  
2 doing the same thing, antagonizing violence?

3           And even people like John Earl Sullivan in his own admission when he's countering  
4 "PSYOP The Steal," the documentary that was made, he admitted that he even knew that  
5 there was going to be a violent attack on the Capitol Building, but, oh, he's the  
6 self-righteous one and he was trying to tell the FBI and he was telling the government  
7 that chaos was going to happen and they didn't do anything. "So I just went with my  
8 camera to take a look and to see it for myself."

9           Bullshit. You knew exactly what was going to happen. You were a part of all  
10 that.

1 [3:16 p.m.]

2 BY [REDACTED]:

3 Q So the tear gas was kind of increasing, and you decide to leave the Capitol.

4 Do you just go back to your golf cart?

5 A Uh-huh.

6 Q Okay.

7 A Yep. I left. Listen, everybody was out of there. At that time -- listen, I'm  
8 not trying to clash or -- I was literally -- you can ask the Capitol Police. There's video of  
9 me, I'm sure, going up to them, saying, "Dude, I'm sorry. I don't know what the fuck is  
10 going on. This is bullshit." Okay?

11 I wasn't forcing myself. But I was there to watch and to witness and figure out  
12 what the fuck, so that afterwards I could tell people firsthand what happened, like Matt  
13 Schlapp and Mike Pence's nephew. I texted them videos telling them that all this shit  
14 was staged. I never heard back from those people.

15 But, yeah, I got tear-gassed, a bunch of canisters. I grabbed the person I was  
16 with, and I said, listen, put your hand on my shoulder -- I've never done this shit before,  
17 so everything was just fucking kind of on the whim. But, like, that's coming, we need to  
18 leave. Whatever you do, do not remove your hand from my shoulder. We need to get  
19 out of here.

20 And it was just me and a whole pack, a crowd of people who could barely see,  
21 hacking, coughing. Listen, I wanted to join the Army and go to Special Forces. I know  
22 we're going to get tear-gassed eventually. I just never thought it was going to happen in  
23 my own Capitol Building --

24 Q And this is --

25 A -- by my own police.

1           Q    This is Maryam Henein that you're guiding out from the Capitol?

2           A    Yeah.

3           Q    Okay.

4                   BY [REDACTED]:

5           Q   And you know that she has written sort of a first-person account of what she  
6   experienced on that day, right?

7           A   She took all that information from me.

8           Q   Okay. So, in that, she says that you asked her, do you want to go back in  
9   the Capitol?

10          A   Yeah, I guess. I mean -- well, yeah, because, remember I said that Right  
11   Side Broadcasting was there? Like, dude, I need to go get those guys. I'm gonna go in.  
12   Do you want to -- do you want to go home? I don't know what -- you're sitting here  
13   crying to me, telling me that you lost your boyfriend. Like, I need to get those guys.

14          So, yeah, that's exactly -- I don't know exactly what verbatim or words, because I  
15   didn't even look at her shit. I briefly went through the stuff. I'm like, this girl is writing  
16   all this that I'm kind of talking to her about. Okay, whatever. Right? So --

17          Q    So I guess, just to clarify, though, how close do you get to going inside the  
18   Capitol?

19          A    I never had any intention of going inside the Capitol. If I said I wanted to go  
20   back --

21          Q    That's not the question. The question is, how close did you get to going  
22   inside the Capitol?

23          A    I was never close to -- in my opinion, I was never close to it, because I went  
24   to the outer rim and I was on the steps. I never had any intention of any going inside.  
25   Never did I try to get to the doors. Never was I trying to.

1 Q Okay.

2 BY [REDACTED]:

3 Q Okay. So do you take -- when you get back to the golf cart, are you taking  
4 Maryam back to the hotel with you?

5 A Yeah. Listen, it was pandemonium, it was chaos. A bunch of -- mass of  
6 people. I recorded my 1-minute video that you guys had to have seen.

7 You know, listen, I knew something was happening. Like, people,  
8 organizationally-wise, like, I know that's a Delta Force. Delta Force is the best at  
9 creating chaos overseas and creating mass mayhem with a few people. Fuck it, we are  
10 the best at that, okay?

11 And when you watch some of the videos of people with Capitol Police  
12 Department, the guys are in, like, civilian clothes saying, "Hey, we got your back," because  
13 these are --

14 Q We've got -- we have this camera that's on you, so if you can stay, kind of, in  
15 your seat and in that area.

16 A So -- I'm sorry, they're glorified rent-a-cops at a certain point, because not all  
17 of those staff are adequately qualified and trained to be there. And that day caught  
18 them all with their pants down, okay? Let's just be honest.

19 But civilians that know what they're doing, that know how to break down  
20 perimeters and barriers and do it with personnel, instead of going, "Yeah, fuck you guys,  
21 fuck you, I can't believe you're supporting this or fighting with patriots or whatever," no,  
22 the smart ones are going, "Hey, listen, stop, I got your back" --

23 Q Hey, Jason, again, can we just have you sit in the chair? Just --

24 A So I'm giving you an example of people making the Capitol Police  
25 Department retreat and civilians that were helping them do that, so they were losing

1 ground steadily, going towards the Capitol Building, until there was no perimeter.

2 Q I just want to make sure everything you're doing is reflected in the  
3 record so --

4 A Yeah. So I'm just saying, people --

5 Q Your movements just won't come across in the record, so I just want you to  
6 describe --

7 A I want you to know --

8 Q -- what's going on.

9 A You know what I'm talking about.

10 Q Yeah.

11 A I don't have to describe it to you. Because if you go back and you watch  
12 the video, you see that civilians and people are forcing the Capitol Police Department to  
13 retreat. And the cops are, like, asking them what -- like, kind of looking around, and  
14 they're retreating, losing ground. Eventually, you have that a couple times, and the  
15 fucking Capitol is -- what happened at the Capitol.

16 Q Since we're now -- we'll come back to the golf cart. But since we're now,  
17 kind of, leaving the area of the Capitol, we've tried to figure out exactly what was set up  
18 in that Lot 8 area. And I know you've said you recall looking at that area and not seeing  
19 anything. We've gone back --

20 [REDACTED]. Well, time out.

21 Is that true? Did you actually look at the area where --

22 Mr. Funes. I did not. Oh, sorry, go ahead.

23 [REDACTED]. Did you look at the area where Ali Alexander's group was publicizing  
24 that they were going to have an event that day?

25 Mr. Funes. That day, I did not.

1 BY [REDACTED]:

2 Q When I had asked you earlier and you described the MRI as --

3 A Unremarkable.

4 Q -- unremarkable, you weren't referring to looking at Lot 8?

5 A No, I was looking at the fact that, do people have pictures of where Ali  
6 Alexander's stage and event was supposed to take place for them or me to see, hey, look,  
7 this is where he was supposed to have the event but didn't. Because nobody took a  
8 picture of anything that wasn't really there of significance.

9 Q Gotcha. Understood.

10 A So other people have shown me video of them walking by where allegedly  
11 Lot 8 was supposed to be, and there wasn't anything there.

12 What I have been told by a couple people is that people were kind of rushing to  
13 kind of put something together to say that there was something there.

14 At the end of the day, I don't know what parameters Capitol Police Department  
15 has with specific lots and areas. It wasn't an issue with the Medical Freedom tent to  
16 have a bigger stage and risers and speakers.

17 My whole point with Ali Alexander is the fact that he allowed Alex Jones and  
18 Owen Shroyer to bullhorn people, telling people that they were having an event, that  
19 Trump told them to lead the march and to lead people, and that they have an event, only  
20 for them to go to the east side of the Capitol Building, go to the Capitol steps, take a few  
21 pictures, and get the fuck out of there. What event did you actually have? What did  
22 you do to actually deter people?

23 If the rumor was that somebody asked you in the campaign, according to Tucker  
24 Carlson's "Patriot Purge" documentary, and you were there to deter people, well, why the  
25 hell did you have a dumb frickin' smirk on your face, with Alex Jones sitting behind them,

1 and you didn't go to your event and your stage? You just went to the frickin' press  
2 balcony to take a picture and say, "Oh, I don't condone this. This looks like mostly  
3 peaceful protestors," when you just were leaving the mayhem, when you were frickin'  
4 seeing the violence and all these people acting like idiots. So how can he go out there  
5 and say, "Oh, it's mostly peaceful protesters, and I don't condone this"? Why aren't you  
6 at your event? Why aren't you talking and doing something?

7 And the bullshit started when he first told me on that night at the 1776 Coalition  
8 that the reason he left the Ellipse was because he was going to go meet with the  
9 President. I knew that was a bunch of shit from the fucking second he told me that.  
10 And it was only afterwards I started asking about his actual event and if he had anything  
11 there, and there was nothing of significance.

12 So I want to see the pictures he alleges. "Oh, I had people overnight staying  
13 there." Bullshit. The event that you raised money for you did not have.

14 And, a matter of fact, I had people, the weeks leading up to January 6th, speakers  
15 and people that were asking Ali one direct question: Do you have a stage? And you  
16 know what each one of those five to seven people got back to me with? He never said  
17 yes.

18 So, leading up to January 6th, I had questions about his intentions to begin with.  
19 Because you know how embarrassing and stupid it is to ask your event coordinator if you  
20 even have a stage? And these people got back and were like, "Jason, it was really weird,  
21 he actually has never said yes." Because his website said "Capitol steps," yet it had an  
22 asterisk on Lot 8, and which one was it?

23 Q We can --

24 [REDACTED] Why don't we take a quick break?

25 [REDACTED] Yeah.

1 [REDACTED]. We'll take a break.

2 [REDACTED]. Yeah. Let's take a 5-minute break.

3 [REDACTED]. And then maybe we can -- yeah. We'll just step out in the hallway  
4 real quick.

5 [REDACTED]. Yep.

6 [Recess.]

7 [REDACTED]. Okay. We can go back on the record if you're ready.

8 BY [REDACTED]:

9 Q So I just wanted to understand, was it just Maryam that was on the golf cart  
10 with you on the way back to the hotel?

11 A [Nonverbal response.]

12 Q Okay.

13 BY [REDACTED]:

14 Q Can I ask, before we talk about that, specific to January 6th, did  
15 you -- putting yourself back in your shoes that morning, you're at the Ellipse rally. Did  
16 you know that the plan was to send people from the Ellipse down to the Capitol?

17 A According to the Kremers and the people that I was kind of more associating  
18 with, fuck no. The plan was to go to the Ellipse, no fucking march, march to nothing.  
19 We were going to go back to our hotels and watch everything on TV.

20 Q Okay. So --

21 A There was no point in time -- Caroline Wren, I know on good authority,  
22 asked some of Amy's security detail -- and I have this not through Amy or anybody, but  
23 somebody else that was telling me that Caroline Wren was telling them, "Hey, so go  
24 ahead and lead and everybody, and, you know, go ahead and start leading people  
25 towards the Capitol." What the fuck? No. We're going back to the hotel. That's

1 weird.

2 Q Who told you that?

3 A One of the security guards told me that Caroline Wren was instructing them  
4 to lead the crowd and the people and the Kremers to the Capitol Building.

5 Q And this is security that was hired for the Ellipse event?

6 A Yes.

7 Q Okay.

8 You were there --

9 A Or just in general, I guess, but were at the Ellipse event, yeah. I can't say  
10 they were hired for the Ellipse event, just to clarify.

11 Q What were they --

12 A They were working the Ellipse event.

13 Q Understood.

14 So you're there for all of President Trump's speech.

15 A Yes.

16 Q During the speech, he says, you know, we're all going to march down there,  
17 and I'll be with you. What's your reaction to hearing him say that?

18 A Cool. He says what he oftentimes in trouble gets -- you know, people take  
19 things literally. I knew he was not going to fucking walk down there. It's impossible.  
20 The Secret Service would never allow it. That's not in the protocol and would never  
21 happen. I understood it for exactly what he meant: "In spirit, we'll be over there.  
22 I'm supporting you. I appreciate everybody coming out."

23 Because, at that site, if you would've been in the front of that audience around  
24 that stage and you see out into the Constitution Mall and the National Mall -- or the  
25 Washington Monument, I meant to say, and you see the sea of people and flags, that was

1 fucking awesome. It was beautiful. It was glorious. Okay? Never in our wildest  
2 dreams, even there sitting there that day, ever did I think something like that was going  
3 to happen.

4 Q So you didn't take it -- you didn't take it literally that the President was  
5 saying, I'm going to go down to the Capitol?

6 A Hell, no.

7 Q Do you think other people who were there took it literally?

8 A I'm not going to speak for other people, you know? But Alex Jones and  
9 Owen Shroyer telling everybody that President Trump himself told him that he was  
10 walking and he, himself, asked him, Alex Jones, to walk people towards the Capitol  
11 Building? That's fucking bullshit.

12 Q So you said at the beginning of when I started to ask questions just now that  
13 you didn't -- I don't want to put words in your mouth, but I understood you to be basically  
14 saying you didn't expect or understand that the plan was to march to the Capitol. You  
15 thought Ellipse event and then we'll go back to our hotel to watch on TV, I guess, what's  
16 happening --

17 A Yeah.

18 Q -- inside the Capitol --

19 A Yeah.

20 Q -- on the floor of the House.

21 A Like adults.

22 Q So, setting aside President Trump saying, I'll be with you, what's your  
23 reaction to him telling people, I understand you're going to march down there?

24 A Ali was having an event down there that was supposed to be safe and  
25 secure. If it's neighboring next to the Capitol Building and there's an ask for National

1       Guard and all this other stuff, wouldn't you think that they would have a safe  
2       environment for there to be a place that they had permitted to take place?

3           I saw it as: Women for America First were doing their event. Let Ali Alexander  
4       have his little slice of the cake that he just fucking can't resist, and he's going to do his  
5       own shit. And I don't want anything to do with him. I didn't have any intention. It  
6       was fucking cold. My feet were wet and soggy. Like, I wanted to go back to the hotel.

7           Q    Right.

8           A    Like, never in my wildest dreams would I imagine something like that to  
9       happen. Listen, every march was a march for Trump, march for Trump. Right?

10           Everything went to shit because of Cindy and other people inside, of who was  
11       going to be in charge of who. Cindy even thought that she was going to be in charge of  
12       the J6 event herself, that pompous idiot. Okay?

13           So, when things got blended in and Caroline Wren was supposed to be the  
14       peacemaker -- who Roger Stone was all about and had a great relationship with Caroline  
15       Wren, okay? So, when things started leaning more towards sabotaging and being more  
16       favorable towards Ali Alexander and Stop the Steal, I understand, because it was Caroline  
17       Wren. Okay? Does Don Jr. know all -- Kimberly Guilfoyle's an idiot, but does Don Jr.  
18       know all this stuff? No, I don't believe so.

19           But I know that when people are mediating and trying to do -- basically, Caroline  
20       Wren was doing what I was doing, like, event operations and events and coordinating  
21       stuff, to an extent, right? Because I saw her doing her thing, right? I don't care. Go  
22       ahead. I'm not here to work. I want to be just a normal person today, right?

23           But when I find out after the fact that even Caroline Wren is trying to trick people  
24       into going towards the Capitol Building, when there's no plan of that, how dare her,  
25       especially after knowing that shit was already going down. I don't know if she knew, but

1 the security team obviously knew that, hey, there's chaos there, don't be going there.  
2 Okay, roger that.

3 We're here to protect people. We're here to have safe and awesome events  
4 that are fun and people go home and talk about. That got stolen from us that day.  
5 And it was because of Ali Alexander and Stop the Steal and Alex Jones and all the people  
6 that supported him.

7 BY [REDACTED]:

8 Q Okay. So let's break down that conversation that you mentioned with Ali  
9 Alexander when you get back to the Sofitel. How did you run into him?

10 A So I had questions about Ali from the beginning -- questionable character,  
11 fundraising methods, his ability to manufacture the movement that he created on social  
12 media. And when I found out that he was going to be coming to the 1776 Coalition  
13 event, especially after I got tear-gassed and I was still wearing the same clothes, I was  
14 like, "Holy shit. Really? He's coming here?"

15 First of all, I was distraught. It was a fucking very intense event. Like, I still had  
16 the stickiness and the sweat and just everything on my person from, like, being there.  
17 And now I have Ali Alexander coming to this little shindig? What the fuck?

18 I needed a little moment, and I left, like, the top floor where the event was going  
19 on or supposed to be happening, and I just needed to go collect myself and, like, go to my  
20 room. I was thinking about changing or showering or whatever, but there was just a lot  
21 going on. I literally just had to get my time to myself.

22 When I go downstairs, I forget my room key, so I go to the front desk in the lobby.  
23 So, when I go from my floor to the hotel lobby, who is right in front of me when the  
24 elevator doors open? Fucking Ali Alexander, standing next to Michael Coudrey, with  
25 two skinny guys, hot and sweaty and bothered-looking, like Estee Lauder models, like,

1 fucking fruity, leaning all on each other as the door opens like this. And I'm like, huh?  
2 And then Ali and Michael Coudrey are, like, fucked up, like, "Oh, hey. Hey,  
3 what's up, Jason?" "Hey, what's up, man? I just forgot my room key. I'll meet you  
4 guys upstairs." But they were so hot and bothered, the fact that I saw them just kind of  
5 in their natural state, leaning on another two men.

6 Listen, you can go do your thing. Gay people are going to heaven too. I have  
7 nothing -- no problem with that. But it looked really fucking funny when the door just  
8 opened and it was just him and Michael Coudrey and these two guys hanging on each  
9 other, with their shirt and buttons undone and all hot and sweaty when it's freezing  
10 outside. Okay?

11 So, okay. I now need a couple extra minutes to go back to my hotel room.

12 So, yeah, I asked him questions that night. And I was asking him what kind of -- I  
13 forget -- like, it was just so much going on at the time, so it sucks, I wish I would've had a  
14 better recollection of exactly and specifically what it was.

15 But the conversation, again, that he left the Ellipse to go talk to the President. I  
16 was like, well, shit, I guess he had something important to say. You know, that's not a  
17 me-and-you call. It sounds like the President was talking, speaking to you. Okay.

18 Well, what happened at the event? Why didn't you deter people? Why didn't  
19 you go on your speaker and your stage and tell people to get off and get out of the  
20 Capitol Building? Why didn't you do that? "Oh, well, it was just so much chaos that,  
21 you know, we just had to abandon the whole thing, and we couldn't do the event  
22 anymore."

23 Well, you abandoned a bunch of patriots and Americans, and you could've been  
24 the person, the savior, to help get them out of a mess, but instead you allowed all that  
25 happen. And by you not having an event and getting on your speaker, on your stage,

1 and calling out to the crowd, you made things worse.

2 Q Just to clarify, this conversation is later, once you go up to the event?

3 A Yeah. Like, this is kind of drawn in between the conversations I was having  
4 with them inside of the event, and I literally was a little kind of pesky person, followed  
5 them out to their car, or when they were waiting for their Uber outside, to ask them a  
6 couple more direct questions, as in: Well, where do we go from now? What do we  
7 do? "Well, I'm going to come back in 3 months."

8 Three months? What the fuck? Why are you saying 3 months? We just had  
9 one of the most eventful days in American history, for better or worse, and you're talking  
10 to me about coming back in 3 months? What the hell does that mean? That struck me  
11 as so odd.

12 So everything about him, the dodginess -- I had other people trying to ask him  
13 questions. He was whispering and going around to each group of people at that event,  
14 asking them questions, asking them everything they knew or what was going on, blah,  
15 blah, blah.

16 And he never -- and I kind of -- after he was speaking to people, I was going  
17 around the room, being like, "Well, what did he say?" Like, "Actually, he was being  
18 really weird. He was dodgy." And, like -- you know.

19 It's who he is. It's nothing more, nothing less. That's exactly who Ali Alexander  
20 is. A con artist. He mis- -- he leads people. It's cloak and dagger, by any means  
21 necessary, because Ali is the self-proclaimed king. And he wanted all the credit in the  
22 world for all the D.C. events until the J6 thing happened.

23 Q Okay.

24 Any other specific questions or details of that conversation with Mr. Alexander  
25 that you can remember that we haven't discussed?

1           A    No. I mean, there was so much fucking going on at that time, and it  
2 just -- and I remember I was buzzing around him. He probably felt it a little bit, that I  
3 was asking him questions, and he was probably pissed off a little bit. Because I was the  
4 guy having his speakers ask him the direct question leading up to Christmas and after  
5 Christmas, going, "Hey, do me a favor. Ask him if he has a stage."

6           All he had -- all the people -- all he had to do if he was having a stage was just say  
7 yes, a simple yes, to a question. Why do five-plus people ask him if he has a stage,  
8 which is an embarrassing question to begin with, and they call me afterwards and say,  
9 "Hey, he actually really never said yes"? That's fucking weird.

10          Q    Understood.

11          And, then, so after the 17 -- well, actually, just quickly, can you describe to me the  
12 1776 Coalition event? What was it?

13          A    Chris Lippe, 1776 Coalition, he's the financer behind it. He's putting Cordie  
14 Williams, the "Microphone Marine" -- who had just got viral off of one video. He's a  
15 chiropractor who has never done anything in politics, but apparently he's qualified to run  
16 for Senate in California.

17          Q    Okay. And then --

18          A    And Matt Couch and a couple, sort of, group of his friends and those people.  
19          So, after he left the AMPFest event at the Phoenix Hotel, where he was with Katya  
20 (ph) -- Katya Lee Jones (ph), I think her last name is -- and Bianca and all those people at  
21 the Phoenix Hotel, he came to us afterwards.

22          Q    Okay.

23          [REDACTED]. Any more questions on the 6th?

24          [REDACTED]. Yeah, actually.

25          BY [REDACTED]:

1           Q     A while back, I think you were talking about -- in relation to Charles Bowman,  
2     talked about him showing you -- and maybe this was also in relation to 1AP; maybe you  
3     can help clarify -- showing maps and layouts of areas. And, initially, you started talking  
4     about the Freedom Plaza, you know, diagram, but the first thing you actually said was  
5     that he was showing you pictures of the Capitol.

6           Did anyone ever show you pictures of the Capitol from --

7           A     I don't think I mentioned --

8           Q     -- [inaudible] perspective?

9           A     I don't think I mentioned anything regarding him showing me maps of the  
10     Capitol.

11          Q     Okay. And maybe I --

12          A     Or pictures.

13          Q     Maybe I misheard, and --

14          A     Yeah, you misheard that. I never --

15          Q     -- the transcript will reflect --

16          A     Anything -- yeah. Everything was mentioned regarding Freedom Plaza.  
17     Never once was the Capitol mentioned.

18          Q     So --

19          A     I said, any reference to the Capitol was part of my investigation with Rudy  
20     Giuliani and the team that was helping him with recordings of leftists or Socialists,  
21     Democratic Socialist Party of America, people like that creating a scene, that if we need to  
22     break windows, then we'll break windows. And those are Zoom meetings of people  
23     planning to attack the U.S. Capitol Building before the election.

24          Q     Okay. I just wanted to clarify that. That's helpful. Thanks.

25          A     Have you guys -- have you guys seen "Stop the Steal"?

1           Q    What is that?

2           A    That's the documentary made by Millie Weaver.

3           Q    What is it?   What's the --

4           A    It talks about Ali Alexander, IIA operations, kind of the -- it kind of goes off  
5    the deep end a little bit where it talks about the rainbow revolution that the United  
6    States started in the U.N. kind of, with purple revolution, orange revolution, and, you  
7    know, the black and yellow, and all these things symbolize something, right?

8           So, between John Earl Sullivan being on probation for antagonizing riots and  
9    situations -- John Earl Sullivan and whoever his father was, who works in psychological  
10   warfare, self-admittedly from John Earl Sullivan's lips and from other sources of people,  
11   why aren't they able to find out who his father was?   And maybe he had more to know  
12   with the planning of January 6th than his adopted Black son being a part of that.

13          Q    You know, you mentioned -- in terms of documentaries, it made me think  
14    about, in that -- I can't remember, Maryam -- whose last name escapes me now.

15          A    Henein.

16          Q    Yeah, Henein.   She refers to you as a videographer.   Do you know why she  
17    would refer to you as that?

18          A    Because she's an idiot.

19          Q    Well, I mean, what -- were you carrying video equipment?

20          A    No.   I had my phone with me.

21          Q    Okay.

22          A    Videographer.   She really called me that?

23          Q    It was in her article that she wrote about --

24          A    That's when she had so much longwinded stuff that I just looked at it, and I  
25    was like, oh, God.

1           Q    That's fine.

2           A    Yeah.

3           Q    So the reason I asked that, though, is, like, were you taking photos and  
4   videos on the 6th at the Capitol?

5           A    Well, yeah. That's what I was telling you before. Like, I had a little bit of  
6   memory. I had stopped along the way. I was taking little videos and stuff.

7           When I got to the Capitol Building, I was trying to take pictures of people when  
8   they took their gas mask off. Because I knew these people weren't the Trump  
9   supporters everybody was telling everybody they were on TV, right?

10          I mean, you guys have the footage of the Capitol Police Department. Like, you  
11   guys should be able to see exactly what I'm talking about. And, in fact, you could  
12   probably follow and see me in my walk to the Capitol Building, if you guys are doing a  
13   proper investigation. I --

14          Q    Did you --

15          A    I did nothing wrong.

16          Q    Do you still have the photos and videos?

17          A    I'd have to go back and look.

18          Q    How were they taken?

19          A    See, so this is where I question things, because one of the biggest pieces of  
20   advice to me was to make sure that you guys don't weaponize something. Because here  
21   I am as a contributor or something, and I don't want to be harassed. And I'll be willing  
22   to discuss things if you guys want it, but I don't want to be weaponized against. I don't  
23   want this process to be weaponized against me more so than it already has.

24          Q    I'm just asking --

25          A    I know you are, but I'm just stating my part too.

1           Q    I understand.  And I'm just asking how the videos -- they were on your  
2    phone?

3           A    On the phone.

4           Q    And do you still have that same phone?

5           A    No.

6           Q    You don't have that phone?

7           A    No, I don't have anything.  No.  I don't have that same phone.

8           Q    Do you know if the photos and videos were backed up in any way before you  
9    didn't have that phone anymore?

10          A    I'm not going to answer that.

11          Q    Why not?

12          A    Because I don't know if you -- what's your followup question?  Do you want  
13    the videos?  Do you want some of the videos and stuff?

14          Like, I don't want to be incriminated into a situation where, like, you know, I'm  
15    holding back.  I'm a willing witness.  Like --

16          [REDACTED].  That's not it at all.  I think what [REDACTED]'s asking is, one of the things  
17    that we're doing and attempting to do is just collect as much, kind of, documentary  
18    evidence about what happened on the 6th.  So --

19          Mr. Funes.  That's what the followup was.  Yeah.

20          [REDACTED].  -- the interest really is just, yeah, if you have the photos and videos,  
21    are you willing to produce them?

22          Mr. Funes.  So that's what you're asking, [REDACTED], is, you want to get some  
23    videos -- or you want to get some of the videos that I shot.

24          [REDACTED].  Yes --

25          Mr. Funes.  Is that what you're asking?

1 [REDACTED]. Yes --

2 Mr. Funes. Because I would've been -- I would've appreciated directness. But  
3 I'm not trying to be rude, but I knew that's what you were getting at. So do you want  
4 some of the videos?

5 [REDACTED]. Yeah, if you have --

6 Mr. Funes. Is that what you want?

7 [REDACTED]. If you still have the photos or videos of your experience on the 6th,  
8 then we'd definitely be interested in seeing that.

9 Mr. Funes. I'll take a look.

10 [REDACTED]. Great.

11 Mr. Funes. There's some stuff on YouTube. I don't know if you guys ever  
12 looked at any of it.

13 [REDACTED]. Yeah, we've seen some of the video --

14 Mr. Funes. Hopefully you -- okay.

15 [REDACTED]. -- that's been posted publicly. Yeah.

16 Mr. Funes. Okay.

17 BY [REDACTED]:

18 Q So one thing that I just want to go back and ask about -- you know, I  
19 appreciate you being forthcoming through this whole conversation and answering lots of  
20 detailed questions that we've had for you. And I know you know that we've seen phone  
21 records. All we have are to and from calls and who they're with.

22 And one that I want to ask you about -- and I'm happy to show you some of the  
23 records to kind of indicate where and when the call happened -- is a call between your  
24 phone and Stewart Rhodes's phone on January 4th. And there's a phone call that lasts  
25 for about 10 minutes.

1           And I just want to ask if you recall that conversation.

2           A     Wow. You know what? This is -- I would love more context about it.

3           Because this is the other thing. Like I said, these people are unknowns to me, right? I  
4           know Stewart Rhodes after the fact. Shit, I think the first time I met Kellye  
5           SoRelle -- well, I know for a fact the first time I met Kellye SoRelle, when I went out to  
6           Texas to meet her, Stewart Rhodes was there. I thought that was the first time I met  
7           the guy. And you know what? Actually, you are reminding me, because I think he  
8           reminded me and said, "Oh, we might've spoken" or something. I was like, "Oh, okay.  
9           Cool."

10           Honestly, you'd have to give me some context or something.

11           Q     So it's a 10-minute conversation that happens around 10:30 at night on  
12           January 4th.

13           A     Yeah, I'd have to, like -- I mean, I totally forgot about that. I did, honestly.  
14           Like, I'm curious to know.

15           I mean, listen, these militia groups were painted a picture even at the time,  
16           through Bowman and Dustin and other people, that these guys are kosher, they're good,  
17           they're here to help us. Right?

18           I'm actually baffled by that, because I honestly forgot. Like, fuck --

19           Q     So --

20           A     -- that's crazy. Because the first time I actually met Kellye SoRelle with  
21           Stewart Rhodes, I thought that was the fucking first time. I know there was a --

22           Q     Why don't we just go back to the night of January 4th? Do you know what  
23           you were doing around, kind of, later in the evening, 10:30 at night, on January 4th?

24           A     Honestly, between, like, meeting prep, I guess, for the 5th, figuring out what  
25           was actually going on for the 6th, trying to figure out what my role was, even -- because

1 even on the 5th, I didn't know exactly what the hell I was supposed to do.

2 Cindy Chafian just told me that she was gonna pay me, I was gonna be there, I was  
3 gonna be event coordinator, right, for her. I didn't know who the speakers were. I  
4 didn't know what the security protocols were. I wasn't privy to any of the questions I  
5 was being asked about. Like, I was going into that event blind.

6 Q Well, why don't we -- let's talk about the night of January 4th. And then  
7 maybe we can get the context around the call, and that might refresh your recollection of  
8 what the call was about.

9 A Yeah, sure, I mean, because --

10 Q So you said you were involved in meetings on the night of January 4th about  
11 the 5th?

12 A No, I'm just saying, like, again, those days were a little bit of just a lot,  
13 between me getting there on the 2nd, me kind of figuring out where I was going to be,  
14 what's going on. Matt Couch was one of the first people that I had, like, made contact  
15 with when he finally got to D.C., okay? And then --

16 Q How about this? Where were you staying on the night of January 4th?

17 A I think I was at the Sofitel.

18 Q Okay.

19 A Yeah. I'd have to look at my -- I'm pretty sure I was there.

20 Q And what was the meeting on the evening of the 4th?

21 A That's what I mean. I mean, I was getting so much, like, resistance and  
22 being kept out of the loop of the stuff that, like, I don't know how formal many  
23 conversations were about the leading-up-to, opposed to me just going and being at the  
24 Willard Hotel too. Because Sofitel, Willard, right? I mean, there was a lot of overlap.  
25 The Willard was more the happening, kind of, social spot, right?

1           So, at that point in time, I'm meeting a lot of the people that have been a part of  
2    all these D.C. events leading up to it, right? So, I mean, I think even the 4th might have  
3    been the day that that drama bullshit went down with Kylie, if I'm, like, looking back and  
4    remembering. I'm not quite sure.

5           Q    Let's just refocus a little bit. So you're staying at the Sofitel --

6           A    Yes.

7           Q    -- on the night of the 4th, but you just mentioned the Willard.

8           A    Yeah.

9           Q    Did you go to the Willard the night of the 4th?

10          A    Listen, we were bouncing between. The Willard was the central spot  
11         because of location, and of course Freedom Plaza's right there, right? So the downstairs  
12         lobby is cool.

13          Yeah, we were back and forth at the Willard Hotel, just like most people were,  
14         except security was getting stricter to get into the Willard Hotel, right? So it's like, you  
15         had to have a badge or you had to, like, be a guest, especially by the time, like, the 5th  
16         and 6th was happening, right?

17          Q    So what did you -- on the 4th, what do you recall going to the Willard for?

18          A    Listen, like I said, I don't have any one specific -- there's people from both of  
19         our, you know, groups at this hotel and over here that are intermingling. Nothing  
20         stands out to me as, like, oh, I specifically went there for this.

21          Q    What time did you get to the Willard on the 4th?

22          A    Like I said, man, I don't know. I might've been there a couple times even  
23         during the day and in the evening, for all I know.

24          Q    Let's just focus on the evening. Do you know when you arrived at the  
25         Willard?

1           A    I would have no idea.

2           Q    Okay.

3           A    Yeah.

4           Q    But you were there with Kylie?

5           A    No, I was not there with Kylie. I was there with a bunch of people. I think  
6    Kylie had come down and had her little tirade. I was never there with Kylie. I think  
7    you framed that question wrong.

8           Q    So was it -- or, sorry. You had just told me that you think maybe it was the  
9    4th --

10          A    I said maybe it was the 4th, that night, where Kylie had that episode and,  
11        you know, she was just being a bitch, and fucking one of the security guys said, "Hey, Kylie  
12        wants their jacket back," the Women for America First jacket, and I was like, "Fucking no  
13        problem. Here you go."

14          Q    Okay. So they are distinct --

15          A    So I'm just saying, maybe I'm -- I'm still even trying to place which day that  
16        was.

17           BY [REDACTED]:

18          Q    I think, just to be clear, it just clicked with me. When you first told us that  
19        story about wanting the jacket back, it was in the midst of us talking about the bus tour in  
20        December.

21          A    Oh, okay. So there --

22          Q    And then what --

23          A    -- you go. Okay.

24          Q    -- I think I understand now is, you had a jacket that was from the bus tour,  
25        but in January Kylie wants it back.

1           A    No, no. Okay, hold it. Because this is good. Because, again, I'm still -- all  
2    this stuff kind of blurs in together.

3           I don't think we even actually had Women for America First jackets until the 6th  
4    event, if I recall correctly.

5           Q    Okay.

6           A    Maybe I'm wrong about that. Like, some of the stuff is blurred in together.  
7    So that's why even sometimes I'm like, fuck, like, what was December 12th and what was  
8    January 5th, you know?

9           Because, again, the VIP tents, like, some of these interactions and who the people  
10    were inside of the tents, like, I'm having trouble recalling back. It's like, oh, shit, was  
11    that at the December one or the January 5th one? Because it was the identical setup,  
12    too, for that day, with the VIP tent next to the stage at Freedom Plaza.

13           Q    So talk about all this in the context of, to the best of your recollection, what  
14    was going on on January 4th. Do you not remember -- or, I shouldn't phrase it "do you  
15    not remember." Does any of that help jog your memory about talking on the phone for  
16    10 minutes with Stewart Rhodes at about 10:30 at night?

17           A    It honestly doesn't. Like, I fucking spaced until you said that, that I'd talked  
18    to Stewart Rhodes. I actually don't have any idea. I didn't even know or recall that  
19    that conversation had happened, to be honest with you.

20           Q    Okay. So you don't -- so, now that we're telling you that your records show  
21    that --

22           A    I'm trying -- yeah. I'm trying to recall, and I don't -- I don't --

23           Q    You don't remember anything --

24           A    No.

25           Q    -- about that phone call?

1           A    No. Until you guys had mentioned it, I hadn't even honestly thought about  
2 it, because I don't remember that conversation.

3           BY [REDACTED] :

4           Q    But you're saying you remember the call occurring?

5           A    No, I actually -- no. That's what I mean. I do not remember the call  
6 occurring. I didn't even realize I had talked, interacted with Stewart Rhodes before,  
7 honestly, until I -- the month of February is when I'd gone to Texas.

8           So, again, this is why I'm kind of being cautious of this, because fucking that guy's  
9 being charged with some pretty heavy shit, okay? And that guy's an idiot. He let  
10 himself be used by people. Because, a matter of fact, I didn't even bust his balls when I  
11 first met him about the whole thing, because he was getting squirrely. He was already  
12 fucking on edge. It seemed like he was, like, a target of an investigation to begin with.

13           That's when I had met and known his other Proud Boys leader, which is a Black  
14 gentleman. It's already kind of public, and I'm just saying this to maybe even protect  
15 him or -- I don't even know. But supposedly --

16           [REDACTED]. Is it Michael Simmons?

17           Mr. Funes. Does he go by "Whip"?

18           [REDACTED]. Yep.

19           Mr. Funes. Yes. Yeah.

20           So I was falling for the same story that Stewart Rhodes was pitching to everybody  
21 back in February. "I got" -- he didn't say "I got played" because he's too pompous and  
22 proud, right, but that Kelly Meggs and these other people branched off of him, he told  
23 those people to stand down, he told them not to go with Ali, and they did it anyway.

24           So, to me, me meeting him -- which I think is almost for the first time too, because  
25 I fucking forgot about that call. I know there was a point in time where, again, the

1 Friends of Stone chat type of thing -- and maybe I -- I had to have been put on there after  
2 January 6th, the Friends of Stone chat. If you guys have access or something, that  
3 probably should be something you guys want to look at.

4 But when I had met Stewart Rhodes in Texas until right before when you just told  
5 me that, I pretty much thought that that was the only time I met with him. I think we  
6 did have an interaction, and even at that time I didn't even know who he really was or  
7 that he was head of Oath Keepers or what context it was. Because when I saw him in  
8 person in Texas, it felt like it was the first time I ever met him.

9 BY [REDACTED]:

10 Q Sorry, what was that first interaction that you just mentioned?

11 A Well, that's what I'm saying, is, like, when I mentioned -- or when I was in  
12 Texas and I went to go meet with Kellye SoRelle, and Stewart Rhodes was her bodyguard,  
13 with Whip, at the time. And that was in, like, February.

14 Q Okay.

15 A Because here's the thing. I know my investigation and what I was doing to  
16 figure out what the hell was going on led me to Kellye SoRelle. It led me to open up  
17 supposedly a lawsuit that she hoodwinked me on that was supposed to be sealed at the  
18 U.S. Supreme Court. Listen, I went from Texas to Miami and I drove up to D.C. for a  
19 court case that she, like, faked. And I can get into details about that.

20 But, like, this is where -- Stewart Rhodes painted himself as somebody that had  
21 gotten taken advantage of royally. And I didn't bust his balls, I didn't go asking him a  
22 million questions when I was in person with him, because he was getting all squirrely  
23 already to begin with, right? So I bought the story that he said: He had no idea what  
24 was going to happen that day. He told his security guys to stand down, and they did it  
25 anyway. And he was just as surprised as anybody else when they went to the Capitol

1 Building.

2 I bought that at face value. I fucked up. Because now it seems like he had a lot  
3 more to know about what the fuck was going on there that day than he ever told me  
4 about. And whatever document that Kellye SoRelle and Stewart Rhodes worked on that  
5 had some type of constitutional argument for there to be violence of some type or use for  
6 Insurrection Act or whatever -- because they kept bragging to me about it. I was like,  
7 yeah, I know what the fuck you're talking about. "No, Jason, you've gotta go look at  
8 this." Hmm, no, I don't.

9 So Kellye SoRelle and Robert Caron --

10 Q When were they -- sorry. When were they asking you to go look at that  
11 document?

12 A They had mentioned it to me a few times, but I just remember there was  
13 one time of more recent date -- and this is the type of shit that scares me about this shit  
14 with you guys, okay? Kellye SoRelle got her cell phone seized, right, while I was at her  
15 house, okay? And --

16 Q I'm just curious -- sorry. Can you just -- the document you're referring to --

17 A And I'm going on a whim and I'm saying this stuff to be transparent, because  
18 I know some stuff is going to roll over. I should keep my mouth shut, because it just  
19 makes me -- gets me into trouble and hot water. But I'm trusting you guys not to fuck  
20 me on this.

21 Because I don't know what Stewart Rhodes was into until I'm hearing a lot of this  
22 stuff, and now -- because there was a lot of suspicions I had about him to begin with.  
23 Like, who's Oath Keepers? Well, Oath Keepers, Kellye was telling me, has been around  
24 for, you know, so many years and decades and 100 years, and, you know, it's this  
25 group -- no, it wasn't. It just got made up in 2009, apparently. They lied to me.

1           Like, Stewart Rhodes's whole fucking alibi and story was co-created with Kellye  
2        SoRelle. Kellye should be investigated.

3           Q    What's the document that you were referring to that they were encouraging  
4        you to look at?

5           A    Something -- I never looked at it, never looked it up, but it was something to  
6        the effect of, like, it was their masterpiece in regards to --

7           Q    This is a -- I can fill some of the gaps for you. This is a document they  
8        created before January 6th? Is that what it is?

9           A    It was -- yeah. I want to think it was maybe even before the elections,  
10       perhaps.

11          Q    And so --

12          A    I'm not sure.

13          Q    -- I guess, here's my question: So there is a letter that he and Kellye SoRelle  
14        co-author and they post to the website and encourage people to go look at. They  
15       actually do two of them. And it's about whether or not Donald Trump -- or encouraging  
16       President Trump to invoke the Insurrection Act.

17          A    Uh-huh.

18          Q    Why were they encouraging you to go look at that letter after the 6th?

19          A    I really felt like my time was wasted -- not wasted, because I found out a lot  
20       more. But they were trying to trick me and misinform me a lot about what Stewart  
21       Rhodes was doing, what he was planning on doing, and what he was a part of that day.

22          Q    Okay.

23          A    And so, for whatever reason, they were like, "Oh, Jason, you have to -- this is  
24       important."

25          Q    The other information that we have on the phone call is just that it's an

1 incoming call, so Stewart Rhodes called your phone. Do you know how he would've  
2 gotten your contact information?

3 A No idea. I have no --

4 Q Okay.

5 A I mean, huh-uh. That probably makes more sense, because why would I  
6 reach out to him? I mean, I just don't -- that's --

7 Q Did you have any conversations with Bianca Gracia around the 4th or the 5th  
8 about whether or not she was in contact with Stewart Rhodes?

9 A I think any interaction or conversations I had with Bianca was more related  
10 to the event that they were doing on the 6th.

11 Q Okay.

12 A I think it was probably --

13 Q You're saying you think it was more related, but did you talk at all about  
14 Stewart Rhodes?

15 A I can't imagine that Stewart -- Stewart Rhodes wasn't a known quantity to  
16 me as much. Oath Keepers and those things were getting involved and talked about, A,  
17 because Ali Alexander brought him as his security team. Like, who are Oath Keepers,  
18 right? That's the first time I got introduced to that, back in, like, November, right? So  
19 he wasn't a known quantity to me until after January 6th.

20 Q Okay. And --

21 A And, again, you've got to remember -- you've got to remember the fact that  
22 I'm in between everybody, you know? I get phone calls and I'm giving my phone  
23 number out and -- whatever, right? I'm not keeping track of all these people. Nor do I  
24 even have a chance to even vet half these people, unfortunately.

25 Again, this is why I got played, too, and a lot of us got played that day. I think

1 other people had ulterior motives and just sucked a bunch of us into it. All I had was  
2 face value with a lot of these people. And if one person validated them and another  
3 person validated them, I don't really have time to go through and really check everything  
4 else, because if these people did, then they did their job supposedly, right?

5 So I'm only inviting the good guys in to be a part of something. Because that's  
6 my job, that's the only thing I had, because nobody else -- and Cindy Chafian kept me out  
7 of the loop of everything most of the time. Do you know how shitty it is doing an  
8 advance job and just being out of the loop and not knowing what's happening?

9 Q I want to go to back just to the -- I understand that, you know, you became  
10 more aware of who Stewart Rhodes was after the 6th. But, again, I just want to ask, on  
11 the 4th or the 5th, when you were talking to Ms. Gracia, did you ever talk about Stewart  
12 Rhodes?

13 A If she mentioned it or brought it up. But would I necessarily know? I  
14 don't really think I was in that -- I really knew who Stewart Rhodes was at that time.

15 [REDACTED] Do you know how he would've gotten your phone number?

16 Mr. Funes. No. I mean, it could've been Kellye, Bianca, or anybody else that  
17 he's kind of close to now, but I would be just be guessing like you would be or anything  
18 else.

19 I do know, like I said, the Friends of Stone chat, right? There's a huge swath of  
20 people in there, you know? That's a Signal chat. I fucked up and deleted my Signal  
21 app and reset it and I lost all my chats. So I don't know who was in that chat. But I do  
22 now -- because I was looking back and, again, when I was investigating, I'm looking into  
23 stuff. Like, dude, like, he was in that chat too, right, as well as Kellye SoRelle and a lot of  
24 other people, right?

25 So I don't want to get myself in some hot mess trying to do my best to recall

1 something, but I will tell you this. Stewart Rhodes and Kellye SoRelle were like this.  
2 And I know Kellye SoRelle was like this to Stewart, justifying whatever fucking crazy shit  
3 he had in his head. Because I look back and I'm looking at some of the stuff he was  
4 saying on InfoWars and all this stuff and I'm like, dude, that's not cool. You can't be  
5 fucking saying some shit like that.

6 BY [REDACTED]:

7 Q So you mentioned that Kellye SoRelle might be one of the people that  
8 could've given Stewart Rhodes your phone number?

9 A Potentially, sure.

10 Q And when --

11 A And, again, I'm just guessing. Don't go off of that.

12 Q Yeah, yeah. No, no, I'm --

13 A I'm just throwing stuff out there. I should probably keep my mouth shut if I  
14 had an attorney with me.

15 Q I understand that, yeah.

16 When was -- did you talk to Kellye SoRelle ahead of January 6th?

17 A I don't think I really even -- the first time I had really known Kellye SoRelle or  
18 been introduced to her was when I fucking drove all the way from Florida to Texas to go  
19 talk to her about a lawsuit on election integrity, the one that she was working with Paul  
20 M. Davis on out of the Waco district in Texas, Federal courts in Texas.

21 Q Uh-huh. And when was that?

22 A That was, like -- I think that -- that was definitely after Trump, or after the  
23 inauguration, the 20th, right? So I want to say the first time -- and that's when I met  
24 Stewart Rhodes, who I kind of thought was at the first time too -- was in, I think, early  
25 part of February.

1           Q    Okay.

2           ████████. I think we're getting close to being done. If you can just give  
3    us -- we'll take another 5-minute break, and I'm going to check notes and things and see if  
4    we have any other questions for you. But then we should be pretty close to --

5           Mr. Funes. Cool.

6           ████████. -- getting out.

7           So we'll go off the record for now. We'll just check our notes.

8           [Recess.]

9           ████████. Okay. Great.

10           BY ██████:

11           Q    The only thing I did want to follow up on is: I know that you've had some  
12    meetings with the FBI or that you've met with them before.

13           A    Tried to.

14           Q    Have you handed over any documents to the FBI, or have they asked you for  
15    any documents?

16           A    They denied me the opportunity to --

17           Q    Okay.

18           A    -- okay?

19           So, back in March, one of the people who I thought was a good guy and a patriot  
20    and somebody worth trusting and I couldn't have been more wrong about is somebody  
21    like Patrick Bergy. Okay? So Patrick Bergy, in my opinion, is a fake whistleblower.  
22    And the IIA operations that he designed and helped create and implement are the same  
23    tools that are being used on the American people.

24           He -- yeah, I've dealt and met and interacted with the best and the worst in those  
25    Washington, D.C., events. And when I see people like Robert -- or, I'm sorry, like Patrick

1 Byrne and people who Dustin and Cindy were insistent on speaking -- like, who the hell is  
2 Patrick Byrne? I'm wondering to myself, what the heck is happening? Who are these  
3 people? None of these people were around in 2016. None of these people were  
4 around when I remember. I'm all cool with fresh and new blood, but who are these  
5 people?

6 And now when I realize that they're running around and they're spending their  
7 money on election audits or the fake audits, and yet people like Russ Ramsland and  
8 Sidney Powell -- whatever their personal relationship between themselves, fuck it, I don't  
9 care. But when you're trying to create this lie and this myth of foreign election  
10 interference and they were trying to present it and bait the President with it in order to  
11 declare the Insurrection Act, that's fucked up and that's wrong, because they were giving  
12 false information to a President of the United States.

13 And I'm pretty sure a couple of people that swore testimony in their affidavits  
14 regret it, because people at the Praetorian group and Sidney Powell and others forced  
15 them to.

16 And when you realize that Ali Alexander and, you know, Lin Wood -- and they  
17 were all gravitating towards one another in leading up to the elections, right? And then  
18 you have people like Michael Flynn who's closely associated now with people like Phil  
19 Waldron. And then you have Rebecca Bennett who was on the bus tour, and she's  
20 working with Phil Waldron and going overseas for stuff. I trusted people, and I did think  
21 they were in three-letter agencies but that they were the good guys.

22 I have been jerked around, fucked -- not -- like, just, my life has been turned  
23 miserable. I've had so many people trying to come up with false information and put a  
24 spin on the stuff that I know and try to confuse me for what's going on. And I have dealt  
25 and interacted with almost everybody of significance at the D.C. events, all of them.

1           Even people like Rob Dew lied to me and said that Alex Jones was his childhood  
2 friend and that, you know, that's why he's there at InfoWars. Bullshit. You just came  
3 on board in, like, 2012 right before the Sandy Hook stuff, and your daddy was -- or your  
4 uncle was in the FBI and one of your sources for all the Sandy Hook stuff that Alex Jones  
5 was talking about, right?

6           And then you have Alex Jones being busted -- sorry, this is important -- with  
7 strapper (ph) emails from back in 2005, and who knows who was actually helping him  
8 out? And how does Robert David Steele fit into all this?

9           Q     I just want to keep things, you know, inside the scope of what we're actually  
10 able to look at and what we are looking at. And you've given us a lot of information to  
11 process, and so I just want to thank you for that, first of all. And, you know, we'll  
12 certainly take the information that you've given us and, kind of, track down those leads,  
13 and we appreciate you doing that for us.

14           But I think, with that, we can go off the record.

15           A     Hey, I'm going to -- I'm not finished yet. Let's talk about this permit and my  
16 name that was put on here.

17           Q     Jason, so we have other things -- we have seen the permit, and that's all that  
18 we need from you on that. It's just --

19           A     So my discussions with you over the phone, is that part of our conversation,  
20 in regards to my surprise and shock that my name was used on there?

21           [REDACTED]. Let's go off the record.

22           [Discussion off the record.]

23           [REDACTED] So let's go back on the record.

24           Jason, we were just -- we're done asking questions, and we're trying to wrap up,  
25 but you, I think, were just looking at the permit that Cindy Chafian had for the January 5th

1 event, and you were starting to tell us some feelings you had about that, as it related to  
2 your -- I don't want to put words in your mouth, but you were describing --

3 Mr. Funes. Yeah.

4 [REDACTED] -- from your employment with -- we'll just give you a chance to very  
5 quickly put that on the record so that you can have that.

6 Mr. Funes. I appreciate that.

7 So I was just as shocked to find out that my name was put on the permit, because  
8 I heard that there were conversations and Chafian was trying to reach Department of  
9 Interior and Park Service, right? So, as somebody that's dealt with the process, I know  
10 about it. I want nothing to do with getting permits, dealing with anybody.

11 I heard people's names, like Tim Williams and something Short -- or, not Short.  
12 I'll think of it. But I heard the names that were in conversations, like, while on the bus,  
13 but I had no idea what and how the permits were being, like, captured or how they were  
14 being processed, right?

15 So the fact that they put my name as a point of contact on that permit, when all I  
16 wanted to do was get information, do my advance job, do it well, and now you're going to  
17 be making me accountable to Department of Interior as the main point of contact or the  
18 point of contact for that? That's appalling to me.

19 And that's offensive, because it felt like you're trying to put me in to dirty me up,  
20 when I had nothing to do with this permit process, let alone -- I couldn't even answer any  
21 questions from a member of the audience, let alone Department of Interior, for what was  
22 going on in that event.

23 [REDACTED]. Right.

24 Mr. Funes. So I was just shocked, and I want to put that out there, that, like,  
25 listen, like, I'm appalled that they would put me on there as a point of contact. Not

1 because I'm not a good point of contact. Just because I didn't know anything that was  
2 going on, pretty much, ahead of time. And how would she make me accountable to  
3 Department of interior when I had no idea what was going on?

4 [REDACTED] Understood. Thank you for that.

5 And that will conclude the transcribed interview. We'll go off the record.

6 Mr. Funes. Appreciate it.

7 [Whereupon, at 4:18 p.m., the interview was concluded.]

1 Certificate of Deponent/Interviewee

2

3

4

4 I have read the foregoing \_\_\_\_ pages, which contain the correct transcript of the  
5 answers made by me to the questions therein recorded.

6

7

8

9

10 Witness Name

11

12

13

14

15

Witness Name

Date